



United States Department of the Interior
BUREAU OF INDIAN AFFAIRS
COLORADO RIVER AGENCY
Route 1, Box 9-C
Parker, Arizona 85344

IN REPLY REFER TO:

Real Estate Services - MSC 410
(520) 669-7141

MAY 01 1996

Dear Interested Individuals, Organizations and Agencies:

Enclosed is a copy of the **Supplement to the Final Environmental Assessment (SEA)** that evaluates alternatives to implement the expansion and construction of a new warehouse of the Westates Carbon Reactivation Plant, on leased land, located on the Colorado River Indian Reservation, La Paz County, AZ.

Two alternatives, including no action, were analyzed. These alternatives considered a wide range of regulatory and nonregulatory actions. The Supplement concludes that the findings are of no significant impact. Therefore, a **Finding of No Significant Impact (FONSI)** has been issued on April 29, 1996.

I appreciate your interest and comments on the Supplement to the Final Environmental Assessment.

Sincerely,

Acting Superintendent

Enclosure

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BY:.....



FINDING OF NO SIGNIFICANT IMPACT**Westates Carbon-Arizona, Inc.****Colorado River Indian Reservation**

I have determined that by implementation of the agency proposed action and environmental mitigation measures as specified in the Environmental Assessment, the expansion will have no significant impact on the quality of the human environment. This decision is based on the attached Supplement to the Final Environmental Assessment (EA) dated April 1996, for Westates Carbon proposed expansion of the operating capacity of the carbon reactivation facility and construction of a new warehouse facility under Lease No. B-1122-CR with the Colorado River Indian Tribes (CRIT), LaPaz County, AZ. In accordance with Section 102 (2) (c) of the National Environmental Policy Act of 1969, as amended, an environmental impact statement will not be required. This determination is supported by the following findings:

1. Agency and public involvement was conducted March 15th thru April 5th, 1996 and environmental issues related to development of Westates Carbon Reactivation Plant Supplemental EA were identified. Alternative courses of action and mitigation measures were developed in response to environmental concerns and issues. See Chapter 4F, page 4-15 and Chapter 5.
2. The EA discloses the environmental consequences of the proposed action and two viable alternatives, which includes the "No Action" alternative. See Chapter 2B, pages 2-18 and 2-19 along with Chapter 4.
3. Protective measures will be levied to protect air and water quality. See Chapter 5, pages 5-1 and 5-2. Specific mitigation measures include the installation of the air pollution control equipment as described in Section 2.A.2.1.5 "Flue Gas Treatment"; Sec. 2.A.2.1.7. Protection Against Release of Contaminants; Section 2.A.2.1.9. Air Emission Summary; Resource Conservation and Recovery Act (RCRA) Part B Permit; and Section 2.A.2.2.6 "Dust Collection System" of the SEA. The facility's RCRA treatment storage and disposal facility permit will impose federally enforceable requirements on the facility. A monitoring and enforcement program and a pollution prevention plan shall be adopted by the lessee within one (1) year of the approved FONSI, in consultation and coordination with the Environmental Protection Agency (EPA), Bureau of Indian Affairs (BIA) and CRIT to insure appropriate protection of air and water quality. The intent of the program is to minimize or reduce the facility contaminant emissions and discharge without compromising other controls currently in place, approved or proposed (i.e. contaminant monitoring of discharge streams, work area and employees health monitoring, site inspections, etc.) See Chapter 4, page 4-1, and Chapter 5.
4. The proposed action is planned not to jeopardize threatened and endangered species. See Chapter 4.B, pages 4-11 and 4-12.

5. There are no significant adverse effects on cultural resources. Should archeological remains be encountered during project ground disturbing activities, work will stop in the area of discovery and the stipulations of 36 CFR 800.11 be followed. The BIA Phoenix Area Archaeologist and CRIT Museum Director shall be contacted immediately. See Chapter 4.D, page 4-13 and Chapter 5.D, page 5-4.

6. Impacts to public health and safety are mitigated through implementation of safety measures and emergency response contingency plan described in the EA. See Chapter 5C Solid wastes shall be removed from the lease site to a disposal facility meeting the requirements of 40 CFR 257, 258 and 260, as applicable. Protective measures for storm water runoff, drainage, fugitive dust, noise and air pollution prevention shall be adhered to by the Lessee and monitored by the appropriate Federal and Tribal officials. Chapter 5

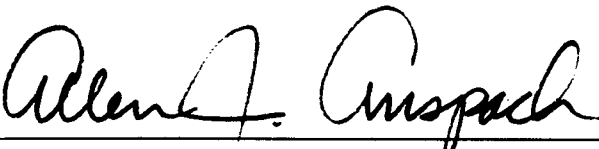
7. Impacts to floodplains affected by the proposed alternative have been evaluated in accordance with Executive Order 11988. No wetlands will be affected. See Chapter 4, page 4-6.

8. The proposed action would improve the economic and social conditions of the affected Indian community. See Chapter 4.C, page 4-11 and Chapter 5.

9. The cumulative effects to the environment are mitigated to avoid or minimize effects of implementation of the proposed project. See Chapter 4.G, page 4-17 and Chapter 5

10. Any proposed expansion of the facilities processing capacity above the RCRA processing capacity of 2760 pounds (lbs.) per hour of wet spend carbon feed to the RF-2 reactivation furnace (i.e. approximately 1200 lbs/hr. capacity of dry reactivated carbon) as identified in the RCRA Part A and B Permits and/or exceeds 200,000 gallons of RCRA storage capacity in the existing warehouse facility, another Supplemental EA will be required. See Chapter 5, page 5-4.

11. Compliance with Executive Order 12898, Environmental Justice and protection of Indian trust assets, Secretarial Order 3175, have been identified and will be adhered to by the Lessee. See Chapter 4.F, pages 4-15 thru 4-16



Superintendent, Colorado River Agency
Bureau of Indian Affairs
U.S. Department of Interior

4/29/96
Date



SUPPLEMENT TO THE
FINAL ENVIRONMENTAL ASSESSMENT (EA)
WESTATES CARBON REACTIVATION PLANT
DEVELOPMENT PROJECT

COLORADO RIVER INDIAN RESERVATION
PARKER, LA PAZ COUNTY, ARIZONA

Prepared by:

RUST ENVIRONMENT AND INFRASTRUCTURE
FOR
WESTATES CARBON - ARIZONA, INC.
PARKER, ARIZONA

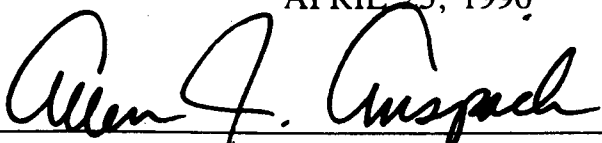
Prepared for:

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF INDIAN AFFAIRS
PHOENIX AREA OFFICE
PHOENIX, ARIZONA
AND
COLORADO RIVER AGENCY
PARKER, ARIZONA

For further information or additional comments, please contact the Bureau of Indian Affairs, Phoenix Area Office, Environmental Quality Services, P. O. Box 10, Phoenix, Arizona 85001 or Colorado River Agency, Route 1 Box 9-C, Parker, Arizona 85344

APRIL 25, 1996

Approved:


Superintendent, Colorado River Agency,
U. S. Bureau of Indian Affairs

Date

4/29/96



SUPPLEMENT TO
FINAL ENVIRONMENTAL ASSESSMENT (EA)

WESTATES CARBON-ARIZONA, INC. (WCAI)
CARBON REACTIVATION FACILITY
AT
COLORADO RIVER INDIAN TRIBES (CRIT) INDUSTRIAL PARK
PARKER, ARIZONA

PREPARED BY:

RUST ENVIRONMENT AND INFRASTRUCTURE
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PARKER, ARIZONA

PREPARED FOR:

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF INDIAN AFFAIRS
PHOENIX AREA OFFICE
PHOENIX, ARIZONA
AND
COLORADO RIVER AGENCY

TABLE OF CONTENTS

<u>CHAPTER</u>	<u>DESCRIPTION</u>	<u>PAGE NO.</u>
1	PURPOSE OR NEED FOR ACTION	1-1
2	PROPOSED ACTION AND ALTERNATIVES	2-1
2.A	Proposed Action	2-1
2.A.1	Facility Location	2-1
2.A.2	Process Description	2-1
2.A.2.1	Reactivation Capacity Expansion Process Description	2-1
2.A.2.1.1	Carbon Feed	2-2
2.A.2.1.2	Spent Carbon Storage and Reactivation Feed System	2-4
2.A.2.1.3	Reactivation Process	2-5
2.A.2.1.4	Packaging	2-6
2.A.2.1.5	Flue Gas Treatment	2-6
2.A.2.1.6	Auxiliary Equipment (System)	2-7
2.A.2.1.7	Protection Against Release of Contaminants	2-7
2.A.2.1.8	Service Water	2-8
2.A.2.1.9	Air Emissions Summary	2-9
2.A.2.2	Process and Warehousing Facility Description	2-11
2.A.2.2.1	Inventory Management	2-12
2.A.2.2.2	Acid Treatment	2-12
2.A.2.2.3	Packaging	2-13
2.A.2.2.4	Reactivated Carbon Receiving and Screening	2-13
2.A.2.2.5	Auxiliary Equipment	2-14
2.A.2.2.6	Dust Collection System	2-14
2.A.2.3	Administration Building	2-14
2.A.3	Environmental Regulations	2-14
2.A.3.1.	Clean Water Act (CWA)	2-15
2.A.3..2	Clean Air Act (CAA)	2-16
2.A.3.3	Resource Conservation and Recovery Act (RCRA)	2-17
2.A.3.4	Emergency Planning and Community Right-to-Know Act (EPCRA)	2-18
2.A.3.5	Department of the Interior--Environmental Justice Policy	2-19
2.A.3.6	Department of the Interior--Environmental Compliance Memorandum No. ECM95-2	2-19
2.A.3.7	CRIT Approvals	2-20
2.A.4	Transportation	2-20
2.A.4.1	Reactivation Capacity Expansion	2-20
2.A.4.2	Processing and Warehousing Facility	2-21

<u>CHAPTER</u>	<u>DESCRIPTION</u>	<u>PAGE NO.</u>
	2.B Alternatives to Proposed Action	2-21
	2.B.1 Alternative 1	2-21
	2.B.2 Non-Action Alternative	2-21
3	DESCRIPTION OF AFFECTED ENVIRONMENT	3-1
	3.A Physical Equipment	3-1
	3.A.1 Climate	3-1
	3.A.2 Air	3-1
	3.A.3 Water	3-1
	3.A.4 Geology	3-2
	3.A.5 Transportation	3-2
	3.B Biological Environment	3-2
	3.C Socioeconomic And Sociocultral Environment	3-2
	3.C.1 Parker, Arizona	3-2
	3.C.2 Colorado River Indian Reservation	3-3
	3.D Historic And Archeological Features	3-4
	3.E Public Health And Safety	3-4
	3.F Environmental Justice And Secretarial Order 3175	3-4
4	ENVIRONMENTAL CONSEQUENCES	4-1
	4.A Impacts on The Physical Environment	4-1
	4.A.1 Climate	4-1
	4.A.2 Air	4-1
	4.A.2.1 Quality	4-1
	4.A.2.2 Noise	4-2
	4.A.3 Water Resources	4-6
	4.A.3.1 Water Sources (Surface and Groundwater)	4-6
	4.A.3.2 Water Quality	4-7
	4.A.4 Land Resources	4-8
	4.A.4.1 Topography and Physiography	4-8
	4.A.4.2 Geologic Setting	4-9
	4.A.4.3 Soils	4-9
	4.A.4.4 Land Use	4-10
	4.A.5 Transportation Network	4-10
	4.B Impacts on the Biological Environment	4-11
	4.B.1 Analysis of Impacts of Flora	4-11
	4.B.2 Analysis of Impacts of Fauna	4-12
	4.C Impacts of The Socioeconmonic And Sociocultural Environment	4-12

<u>CHAPTER</u>	<u>DESCRIPTION</u>	<u>PAGE NO.</u>
4.D	Impacts on The Historic And Archeological Features	4-13
4.E	Public Health And Safety	4-13
4.F	Environmental Justice And Secretarial Order 3175	4-15
4.G	Cumulative Impacts	4-17
4.H	Unavoidable Adverse Impacts	4-18
4.I	Relationship Between Local Short-term Uses of The Man's Environment And The Maintenance And Enhancement of Long-term Productivity	4-19
4-J	Irreversible And Irretrievable Commitment of Resources	4-20
5	MITIGATION MEASURES	5-1
5.A	Physical Environment	5-1
5.A.1	Air	5-1
5.A.1.1	Air Quality	5-1
5.A.1.2	Noise	5-2
5.A.2	Water	5-2
5.A.3	Land Resources	5-3
5.A.4	Transportation Network	5-3
5.B	Socioeconomic And Sociocultrual Environment	5-3
5.C	Public Health and Safety	5-3
5.D	Cultural Resources	5-4
5.E	Other Considerations	5-4
6	LIST OF AGENCIES AND INDIVIDUALS CONTACTED FOR CONSULTATION	6-1
7	LIST OF PREPARERS	7-1

REFERENCES

LIST OF TABLES

Table	Description
2-1:	Incremental Emission Increases
2-2:	Proposed Performance Standards
4-1:	Summary or Environmental Consequences
4-2:	Summary of Permit and Approvals

LIST OF FIGURES

Figure	Description
2-1	Location Map Parker/Colorado River Indian Reservation
2-2	Location Map Facility Location in Relationship to Parker, AZ
2-3	Proposed Processing and Warehousing Facility

LIST OF APPENDICES

Appendix	Description
A	June 3, 1994 Letter From Michael Feeley (U.S. EPA) to Monte McCue (WCAI)
B	July 7, 1995 Letter From David P. Howecamp (U.S. EPA) to Monte McCue (WCAI)
C	August 4, 1995 Letter From Felicia Marcus (U.S. EPA) to Monte McCue (WCAI)
D	Parker, Arizona Community Profile, July 1995
E	Colorado River Indian Reservation Community Profile, July 1995
F	Drawing No. SEAPFD1, Revision 1 - Process Flow Diagram Drawing No. 01-32-001P - Site Plan Drawing No. D14789-02 - Plot Plan
G	Spent Carbon Container Specifications
H	Test Result Summary Pages
I	NPDES Stormwater General Permit Coverage Notice

- J CRIT Support Resolution (February 18, 1994)
- K Building Permit (July 20, 1995)
- L National Historic Preservation Act Compliance/Consultation Requirements
- M Public Meeting Stenographic Record and Sign-In Sheets
Public Notice Transmittal Letter (August 19, 1994)
Public Notice Proof of Broadcast and Advertisement (August 25, 1994)
- N Effect of Westates Carbon, Parker, Arizona Facility on Community Noise
- O Wind Roses (Wind Speed and Direction Data for the Parker Area)
- P Public Comments
- Q CRSSJV and WCAI Permit Limitations Comparison

DISCLAIMER

Pursuant to the requirements of 40 CFR Part 1506, §1506.5, the Consultant declares under oath that it has no interest, financial or otherwise, in the outcome of this project.

Michael D.
RUST E & I Official

01/09/96
Date



CHAPTER 1

PURPOSE OR NEED FOR ACTION

The Proposed Action involves the expansion of the Westates Carbon - Arizona, Inc. (WCAI) carbon reactivation facility located on land leased from the Colorado River Indian Tribes (CRIT). The initial approval of the lease by the Bureau of Indian Affairs (BIA), triggered the National Environmental Policy Act (NEPA) under the regulations of 40 CFR Parts 1500 through 1508, the Department of the Interior's implementing procedures at 516 DM 1-7 and BIA's NEPA guidance at 30 BIAM Supplements 1, 2, and 3. In order to gain initial approval, a Final Environmental Assessment (EA) was submitted to BIA. The lease was approved on March 4, 1991 (effective date) after BIA issued a Finding of No Significant Impacts based on information submitted in the EA. The Primary Term of the lease is 20 years, beginning on the effective date of the lease. Upon expiration of the Primary Term, WCAI has the option to continue the lease for a Renewal Term of 20 years.

No revisions to the lease are required to implement the proposed action, because the lease between WCAI and CRIT authorizes development of the leased premises in a phased manner to accommodate potential business expansion. The initial EA, however, addressed impacts associated with the initial phase of development only. The EA stated that any future expansion of the proposed carbon reactivation plant would require further consideration by BIA.

The initial EA addressed the construction and operation of a carbon reactivation facility with an anticipated maximum capacity of 1,000 lb/hr of reactivated product. Construction of the facility was initiated in 1991 and the facility began commercial operations in August 1992. The nominal capacity of the as-built facility is approximately 600 lb/hr. It was anticipated that a second reactivation unit would be installed at a later date, in order to achieve the full capacity addressed in the initial EA.

WCAI has obtained all of the authorizations required to install the second reactivation unit (RF-2), however, it is now proposing to operate the facility at a capacity of approximately 1,200

lb/hr of product rather than the 1,000 lb/hr previously addressed in the initial EA. Because this exceeds the capacity addressed in the initial EA, WCAI is submitting this supplement to the EA to address the impacts associated with operating the additional approximate 200 lb/hr of capacity.

RF-2 will be installed in a phased manner to ensure that the facility does not exceed the authorized capacity of approximately 1,200 lb/hr of reactivated product. The existing reactivation furnace (RF-1) will continue to operate during the first phase of construction of RF-2. However, RF-1 will be removed from service and disabled by locking out the starters of the motors for the unit's drive, cooling air fan, combustion air blowers and induced draft fan before RF-2 is operational. It is currently anticipated that RF-1 will remain on-site, in a disabled state, until a final decision is made regarding its disposition. RF-1 could not be restarted without EPA approval. The RCRA Part B application contains a more detailed description of the phased construction process.

WCAI is also planning to construct an additional processing and warehousing building adjacent to the current reactivation facility. This building will be used primarily for screening, packaging and storage of reactivated product. These operations are currently conducted within the existing facility warehouse, but will be relocated to improve the efficiency of the operations. Additionally, WCAI is proposing to move its reactivated carbon acid treatment processing operations, which are currently performed in the Los Angeles, California facility, to Parker, Arizona. These operations would also be conducted in the processing and warehousing building. This supplement to the EA also addresses the impacts associated with the proposed transfer of these operations to the Parker site. See Sections 2.A.2.2 and 2.A.2.2.3 for a description of the building and the operations that will be conducted in the building.

The increase in capacity from 1,000 lb/hr to approximately 1200 lb/hr and the consolidation of processing, packaging, and warehousing activities are needed to maintain the economic viability of WCAI's business interests. The Proposed Action would contribute to the economic development needs of the Tribe and would be consistent with the implementation of the Tribal Indian self-determination responsibilities of the BIA. The goals of the Tribal Council include

the enhancement of economic development on the Reservation, appropriate use of Tribal land and generation of employment opportunities for Tribal members. The Proposed Action would benefit the Tribe by generating four new positions at the facility, thus creating increased employment opportunities.



CHAPTER 2

PROPOSED ACTION AND ALTERNATIVES

2.A PROPOSED ACTION

The following discussion addresses the increase in operating capacity from 1,000 lb/hr of reactivated product to approximately 1200 lb/hr of product and the construction and operation of the proposed processing and warehousing facility. It also provides an updated description of the facility and the regulatory status of the facility.

2.A.1 Facility Location

As illustrated on Drawing No. 01-32-001P, located in Appendix F, WCAI's existing carbon reactivation facility and the proposed expansion is located on Lots 13 and 14 of the CRIT Industrial Park, which is located approximately one-half (½) mile southeast of Parker, Arizona. WCAI currently leases approximately 10 acres. The facility location in relationship to Parker, Arizona and the CRIT reservation is illustrated in Figures 2-1 and 2-2. Existing facilities currently occupy approximately 2 acres. The proposed processing and warehousing facility will be constructed adjacent to the existing reactivation facility on approximately three acres of the unused portion of the land currently leased by WCAI. Figure 2-3 illustrates the size and layout of the processing and warehousing facility.

2.A.2 Process Description

2.A.2.1 Reactivation Capacity Expansion Process Description

The process flow diagram, Drawing No. SEAPFD1, Rev. 1, located in Appendix F, is a graphic representation of the reactivation process after the completion of the proposed reactivation capacity expansion. As discussed in Section 2.A.2.1.3, the existing reactivation unit (RF-1) and associated air pollution control equipment will be taken out of service prior to the start-up of reactivation unit RF-2.

2.A.2.1.1 Carbon Feed

Activated carbon is utilized in treatment equipment for the removal, by adsorption, of organic compounds from liquid and vapor phase process and waste streams. The treatment equipment is used in a wide variety of municipal and commercial applications. The industries which use this equipment include, but are not limited to, petroleum refining and marketing facilities, solvent cleaning facilities, auto manufacturing and repair facilities, aircraft manufacturing facilities, and other facilities that generate organic waste streams. Additionally, activated carbon is used in a variety of environmental clean-up applications. Thus, depending on the treatment process, the carbon is referred to as either liquid-phase or vapor-phase. To date, approximately 50% of the spent carbon received at the facility has been vapor phase carbon, however, this may change over time.

Constituents in the streams being treated are transported into the porous activated carbon particles by diffusion, where they are adsorbed onto the extensive inner surfaces of the activated carbon. Adsorption continues until the adsorption equilibrium capacity is reached, at which time the influent and effluent concentrations of the constituents in the stream being treated will be equal. However, the purpose of the treatment is to reduce the concentration of certain constituents in the stream being treated and, therefore, it is necessary to replace the activated carbon in the adsorption vessel at or before the point in time when the effluent concentration approaches the treatment objective, which is usually before the activated carbon's equilibrium capacity is reached. The treatment objective is reached either when the activated carbon has been in service for a specified time or when a pre-determined constituent concentration is detected in the effluent stream. The activated carbon is said to be "spent" when the treatment objective is met. Because the treatment objective is to reduce the concentration of certain constituents in the stream being treated, generally only part of the carbon in the adsorption vessel will have reached its equilibrium capacity. Spent carbon can contain up to 0.3 pounds of adsorbed material per pound of dry carbon at equilibrium capacity.

Once the activated carbon is spent, it must either be disposed of or reactivated at a facility such as WCAI's Parker facility. Some of the spent carbon received at the Parker facility, which

operates 24 hours per day, seven days per week, is designated as a hazardous waste under the provisions found in the implementing regulations for the Resource Conservation and Recovery Act (RCRA). While this is subject to change during the life of the facility, approximately 70% of the spent carbon received, to date, has been classified as hazardous. The proportion of RCRA spent carbon received at the facility has increased from the estimate in the original EA (20%). This increase is a reflection of market changes and federal regulatory changes which dealt with the reclassification of some spent carbons. The RCRA Part A and Part B permit applications describe the types of spent carbon that can be processed at the facility. The types of spent carbon that are processed at the facility are not expected to change as a result of an increase in the operating capacity of the facility. Spent carbon storage is described in Section 2.A.2.1.2.

At any one time, up to 134,181 gallons of hazardous spent carbon can be stored on site. 100,000 gallons can be stored in containers within the warehouse and up to 34,181 gallons, which includes four identical 8,319 gallon storage tanks and one 905 gallon furnace feed tank, can be stored in the spent carbon and waste feed storage tanks. 170,000 gallons of nonhazardous spent carbon can be stored on-site. The following table represents the facility's storage capacity:

STORAGE LOCATION	CONTENTS	CAPACITY
T-1	Spent Carbon	8,319 Gallons
T-2	Spent Carbon	8,319 Gallons
T-5	Spent Carbon	8,319 Gallons
T-6	Spent Carbon	8,319 Gallons
T-8	Spent Carbon	905 Gallons
Warehouse 1	Spent Carbon	200,000 Gallons
Warehouse 2	Spent Carbon (nonhazardous)	170,000 Gallons
Product Packaging Building	Reactivated Product	600,000 Pounds

2.A.2.1.2 Spent Carbon Storage and Reactivation Unit Feed System

The method of feeding spent carbon to the reactivation unit will not be altered. Spent carbon is received in containers and tank trucks in accordance with the U.S. Department of Transportation requirements. Spent carbon is received in several different types of containers. The most prominent are steel or plastic 55-gallon drums, however, it can also be received in the actual adsorber vessels, totes, supersacks, or roll-off bins. Specifications of the types of containers in which spent carbon is typically received can be found in Appendix G. The specifications include typical materials of construction and sizes.

After inspection and acceptance at the facility, all containerized spent carbon is stored in the Container Storage Area or the Non-Hazardous Spent Carbon Storage Building in the containers in which it was received. The Container Storage Area is illustrated on Drawing No. D14789-02, which can be found in Appendix F. Up to 100,000 gallons of hazardous spent carbon can be stored in the RCRA approved container storage area. Both liquid-phase and vapor-phase carbon can be stored in the container storage area. The RCRA Part B application also requests an increase in container storage capacity from 100,000 gallons to 200,000 gallons. The additional container storage area would be located within the existing warehouse, and it would be limited to spent carbons which contain no free liquids (e.g., vapor-phase). This area is illustrated on Drawing No. D14789-02 which can be found in Appendix F.

Up to 170,000 gallons of nonhazardous spent carbon can be stored in the Non-Hazardous Spent Carbon Storage Building. The location of this building is illustrated on Drawing No. 01-32-001P, which can be found in Appendix F. Containers of both vapor-phase and liquid-phase nonhazardous spent carbon can be stored within this building. Nonhazardous carbon can also be stored within the container storage area.

Prior to treatment, the containerized spent carbon is placed into one of two hoppers, mixed with water to form a water-carbon slurry, and transferred into one of the four spent carbon storage tanks (T-1, T-2, T-5, T-6). Up to 34,181 gallons of spent carbon is permitted to be stored in

the spent carbon storage tanks. Shipments received in tank trucks are pumped as a water-carbon slurry from the transport vehicle into one of the four spent carbon storage tanks.

From the spent carbon storage tanks the water-carbon slurry is pumped to a reactivation unit feed tank. Prior to introduction into the reactivation unit, the water-carbon slurry is dewatered using a dewatering screw. The dewatered carbon is then fed to the reactivation unit. The water generated in the dewatering step is returned to one of two recycle water tanks (T-9 and T-12) where it will be reused in the carbon transport system. The RCRA Part A application limits the total furnace feed rate to 2,760 lb/hr of wet spent carbon. As discussed in the RCRA application, this is equivalent to a production rate of approximately 1200 lb/hr of dry, reactivated carbon, assuming a 50% moisture content and 30% organic loading on the spent carbon.

2.A.2.1.3 Reactivation Process

In order to increase the capacity of the existing facility to approximately 1200 lb/hr, a second reactivation unit (RF-2) will be installed and the existing unit (RF-1) will be taken out of service. Appendix A is a June 3, 1994 letter from EPA that confirms that WCAI is authorized under RCRA to operate a facility with a capacity of approximately 1200 lb/hr and authorizes the phased construction of RF-2 with a condition that the existing unit must be disabled when the design capacity of the second unit equals the remaining total capacity for the facility. RF-2 will be installed within the existing containment area. The new reactivation unit will operate in the same manner as the existing unit.

RF-2 will be a multiple hearth furnace consisting of five hearths. The spent carbon will be introduced into the top hearth and flow downward through the remaining four hearths. Reactivated carbon will exit the bottom hearth through a cooling device. RF-2 will be equipped with a primary combustion air fan and a shaft cooling fan. Steam from a small boiler will be introduced into RF-2 to complete the reactivation process. Natural gas burners will be provided to ensure adequate heat input to the reactivation unit.

2.A.2.1.4 Packaging

The packaging operations which currently occur within the facility will be transferred to the new processing and warehousing facility to improve the efficiency of the screening and packaging operations. Figure 2-3 illustrates the anticipated layout within the processing and warehousing facility. The reactivated product will be transferred from the reactivation facility to a surge hopper within the processing and warehousing facility via an enclosed pneumatic conveying system. The reactivated carbon will be metered from the surge hopper to the product screen via an enclosed screen conveyor. The product will be sized and fed via enclosed systems into supersacks. Scales will be used to automatically prevent the supersacks from being overfilled. The filled supersacks will be conveyed away from the screen via a powered conveyor, and removed from the conveyor with a forklift. The product will be stored in the processing and warehousing facility until it is shipped off-site. It is anticipated that the majority of the product will be stored and shipped off-site in supersacks, however, some of the product may be transferred from the supersacks into treatment vessels or other containers before it is shipped off-site. These transfer operations would occur within the processing and warehousing facility.

2.A.2.1.5 Flue Gas Treatment

The flue gases from the new reactivation unit will enter an afterburner where the contaminants will be exposed to a temperature of approximately 1,800 °F. Exhausted flue gases from the after-burner will be scrubbed in a venturi scrubber to remove particulate matter, a packed-bed alkaline scrubber to remove acid gases, and a wet electrostatic precipitator (WESP) to further remove particulate matter. This will ensure an organic compound destruction efficiency in excess of 99.99%.

Additionally, 75% of the particulate matter entering the afterburner as carbon particles will be consumed.

In order to reduce the amount of water used by the facility, the water used in the air pollution control (APC) equipment is recycled within the equipment. To ensure that the solids concentration in the recycle water does not reach a point that will reduce the operational

efficiency of the APC equipment, a portion of the recycle water is removed from the recycle stream and discharged as blowdown pursuant to the facility's industrial wastewater discharge permit. This blowdown contains the particulate matter and dissolved solids removed by the APC equipment.

2.A.2.1.6 Auxiliary Equipment (System)

One natural-gas fired boiler currently exists at the facility, and a second natural gas-fired boiler will be added. The existing boiler is a 1.34 MMBtu/hr unit and the second boiler is expected to be a 2.88 MMBtu/hr unit. WCAI is planning to install the larger unit to enhance the reactivation capability at the facility. It is anticipated that the existing unit will be retained as a stand-by unit.

2.A.2.1.7 Protection Against Release of Contaminants

A control system will be installed on the new reactivation unit and its associated air pollution control equipment to ensure proper operation and prevent an accidental release of contaminants. The control system includes monitors, interlocks and alarms.

Carbon monoxide emissions, afterburner temperatures, and certain air pollution control device operating parameters will be monitored continuously (i.e., collects data approximately every 5-10 seconds, 24 hours per day, 7 days per week) by instrumentation and by trained operators. The afterburner temperatures are monitored to ensure adequate destruction of organic contaminants. The carbon monoxide continuous monitoring system will ensure proper operation of the reactivation unit. The differential pressure drop in the venturi scrubber, the differential pressure drop and pH in the packed bed scrubber, and the secondary voltage in the WESP will also be monitored by instrumentation and trained operators continuously to ensure proper operation of the air pollution control equipment.

The interlocks on RF-2 will be designed to automatically shut down the unit if certain conditions occur. The facility will automatically shut down if any of the following circumstances occur:

- the afterburner temperature is not at least 1800°F;
- high scrubber temperature;
- venturi water failure; or
- packed-bed water failure.

In an automatic shut down, the spent carbon feed to the reactivation unit will be discontinued, the burners will stop firing and the combustion air and induced draft fans will be shut down automatically. These measures will minimize the potential for releases to the environment. When an automatic shut down occurs, the operator will investigate the cause of the shutdown and take the appropriate steps (such as, increasing the temperature in the afterburner by increasing burner output or restoring water flow to venturi scrubber prior to restarting the spent carbon feed) to correct the problem prior to restarting the reactivation operation.

Alarms are used to inform the operator that action is required. An alarm will sound if any of the operating parameters discussed above are outside the acceptable range. For example, if the venturi pressure drop falls below the set point, an alarm will sound and the operator will implement the measures necessary, such as increasing air flow by manipulating the damper position, to correct the problem.

2.A.2.1.8 Service Water

The service water system will not change as a result of the proposed expansion. Under the terms of the lease agreement, water will be supplied to the facility by CRIT. There will be an annual increase in water usage associated with the increase in capacity from 1,000 lb/hr to approximately 1200 lb/hr. However, the total facility water usage will remain, on average, at or below the 100 gallons per minute (52.56 million gallons per year or 161.2 acre feet per year) which was evaluated and approved in the initial EA.

Water usage at the reactivation facility fluctuates for a variety of reasons. These include the time of the year, the ambient temperature, the type of carbon being reactivated and the processing rate. At approximately 1200 lb/hr, the water usage could fluctuate between 70 and

130 gallons per minute. However, the annual average water usage will be at or below 100 gallon per minute.

Water usage in the proposed packaging and warehousing facility will be negligible compared to water usage in the reactivation facility. Water use in the packaging and warehousing facility will be for personal hygiene purposes only.

CRIT water personnel monitor and document, for billing purposes, the plant water usage approximately once per month via an influent water totalizing meter located at the entrance to the facility.

2.A.2.1.9 Air Emission Summary

Table 2-1 summarizes the incremental increase in emissions that will result from expanding the operational capacity from 1,000 lb/hr to approximately 1200 lb/hr. The table also includes the significant emission rates established by U.S. EPA in the Prevention of Significant Deterioration (PSD) of Air Quality regulations [40 CFR 52.21(b)(23)]. The significant emission rates are used to determine if a net emissions increase is significant. While the PSD regulations do not apply to this facility because the WCAI facility is not a major stationary source of air emissions (See Section 2.A.3.2), the significant emission rates can be used as an indicator of the potential significance of an emissions increase. As illustrated in Table 2-1, the incremental increases in emissions associated with increasing the capacity to approximately 1200 lb/hr are very small when compared to the significant emission rates. The incremental increases were calculated by multiplying measured emission rates from the existing 600 lb/hr facility by the appropriate production ratio (1,000 lb/hr:600 lb/hr or 1200 lb/hr:600 lb/hr), and engineering estimates. Process air emissions will not result in any violations of the ambient air quality standards established by the Clean Air Act. In addition, the RCRA permit will establish stringent performance standards that will further limit facility emissions to ensure protection of human health and the environment (See Section 2.A.3.3). Table 2-2 summarizes the performance standards that were proposed in the RCRA Part B permit application.

Table 2-1 -- INCREMENTAL EMISSION INCREASES				
Pollutant	Controlled Emission Rates (tpy)			PSD ¹ Significant Emission Rates (tpy)
	1,000 lb/hr Facility	1,200 lb/hr Facility	Incremental Increase	
Particulate Matter (PM/PM10)	8.25	9.90	1.65	25/15
Sulfur Dioxide	9.67	11.60	1.93	40
Nitrogen Oxides	19.17	23.00	3.83	40
Carbon Monoxide	10.50	12.60	2.10	100
Volatile Organic Compounds	1.63	1.95	0.33	40
Lead	0.25	0.30	0.05	0.6
Mercury	8.58E-04	1.03E-03	1.72E-04	0.1
Hydrogen Chloride ²	1.14E-02	1.36E-02	2.27E-03	N/A
Notes: ¹ PSD = Prevention of Significant Deterioration of Air Quality. ² Indicative of halide emissions.				

Table 2-2 -- PROPOSED PERFORMANCE STANDARDS		
Parameter	Purpose	Standard (1)
Particulate Matter	To limit particulate matter/metals emissions to the atmosphere	0.015 gr/DSCF @ 7% O ₂
Hydrogen Chloride	To limit hydrogen chloride emissions to the atmosphere	99% removal or 4 lb/hr (whichever is greater)
Afterburner Temperature	To limit hydrocarbon emissions to the atmosphere	1800°F minimum
Carbon Monoxide	To ensure good combustion control	100 ppm _{dv} @ 7% O ₂ on a 4-hour block avg. basis
Notes:		
1. gr/DSCF @ 7% O ₂ = grains per dry standard cubic foot adjusted to 7% oxygen content in flue gas. ppm _{dv} @ 7% O ₂ = parts per million (dry volumetric basis) adjusted to 7% oxygen content in flue gas.		

RF-2 has been designed to include more sophisticated air pollution control equipment than that which was installed on the existing unit. Emission testing on the existing reactivation unit has confirmed that the proposed air pollution control equipment can meet the standards listed above.

The results of the emission testing has been forwarded to EPA as part of the facility's RCRA Part B permit application. At the time of the preparation of the original EA, there were no similar units in use. However, since that time WCAI has collected data from it's existing operations, which is considered to be representative of emissions from the expanded facility. Summary pages of the test results are included in this document in Appendix H.

The source of most of the metals emitted during the reactivation process are from the sources of carbon material (coal and coconut) used to manufacture virgin activated carbon. However, the concentration of these metals can vary. The air pollution control equipment to be installed in conjunction with RF-2 at the facility is described in 2.A.2.1.7. This equipment was selected to minimize particulate matter (including metals), organic and acid gas emissions.

Additionally, the facility has had a metals testing program in place since mid 1994 to ensure the levels of metals in the incoming spent carbon are less than the levels proposed in the RCRA Part B application. Actual testing has indicated that the average metal concentrations in the actual spent carbon received at the facility are significantly lower than the proposed levels. Sampling of the spent carbon consists of taking a grab sample each day from the furnace feed, compositing all daily samples each month and sending these samples to a certified laboratory for analysis.

Results of the analyses have been submitted with the facility's Part B application and are available for review by federal and CRIT officials.

2.A.2.2 Processing and Warehousing Facility Description

A 7,200 foot square, non-RCRA regulated, building will be constructed. A portion of the building will be used to size and package reactivated carbon, and another portion of the building may be used to acid treat reactivated liquid phase carbon. The remainder of the building will be used for reactivated carbon storage. The building will be a 120' x 60' x 24' pre-engineered steel building with a concrete floor. A layout of the building and the location of the operations performed in the building are shown on Figure 2-3. A 60' x 120' pre-engineered metal building will be constructed. The end of the building which houses the screening equipment will have

an eave height of 32'; the remainder of the building will have an eave height of 20'. The roofing and siding will be consistent with the other buildings at the facility. The floor will be a concrete slab having (2) 12" x 12" x 40' trench drains with grating that will be designed to support forklift traffic. The concrete slab will be designed and installed to support the imposed loads.

It is anticipated that the facility will operate from 8:00 a.m. to 5:00 p.m. Monday through Friday and will be staffed by two employees which will be hired locally. The following operations will be performed at the proposed processing and warehousing facility.

2.A.2.2.1 Inventory Management

An inventory of reactivated carbon will be maintained in the proposed processing and warehousing facility. The building will have a storage capacity of approximately 600,000 pounds. It is anticipated that the majority of the reactivated carbon will be stored in supersacks. However, some reactivated carbon may be stored in adsorber vessels or the other types of containers discussed in Section 2.A.2.1.1. Forklifts will be used to move the inventory around within the facility and to load materials for shipment.

2.A.2.2.2 Acid Treatment

The acid treatment of liquid-phase reactivated carbon currently being performed at the Los Angeles manufacturing and warehousing facility may be transferred to the proposed processing and warehousing facility. A 15% solution of hydrochloric acid is applied to coal-based reactivated carbon to make it pH neutral (the coal-based reactivated carbon is alkaline because of the ash content). The acid will be received and stored in 55-gallon or 600-gallon corrosion resistant plastic containers and stored with appropriate containment. It is anticipated that no more than 1200-1800 gallons of a 15% solution of hydrochloric acid will be stored on site at any one time. The acid storage area is illustrated on Figure 2-3. The acid will be applied in a closed system to eliminate fugitive emissions.

Prior to acid treatment, the reactivated carbon will be screened to separate the various sizes.

The liquid phase portion of the screened product will then be loaded, via a bucket conveyor, or other similar equipment, into a corrosion resistant mixing vessel for batch treatment (approximately 1,000 pounds). After introduction of the reactivated carbon, the mixing vessel will be sealed and the acid will be introduced, via a spray header which is fed by a small metering pump at a rate of approximately 15 gallons per batch. During the acid addition, the vessel is rotated to promote even distribution. At the end of the mixing cycle, the treated reactivated carbon will be loaded into bulk sacks or vessels and weighed prior to shipment.

It is anticipated that the equipment used in this operation will include one vibratory screener, one to two bucket elevators, one to two surge hoppers, and one rotating vessel. Forklifts will be used to move the reactivated carbon.

2.A.2.2.3 Packaging

As discussed in Section 2.A.2.1.4, the packaging operations currently performed at the existing reactivation facility in Parker will be transferred to the proposed processing and warehousing facility. Products will be final packaged for shipment. Supersacks will be filled directly off the screeners. A scale will be used to monitor the flow. A feed hopper will also be available to fill other containers. Two additional employees will be hired to package the product and operate the forklifts that will be used to move and load the packaged activated carbon.

2.A.2.2.4 Reactivated Carbon Receiving and Screening

As discussed in Section 2.A.2.1.4, the screening operations currently performed at the existing reactivation facility will be transferred to the proposed processing and warehousing facility. Reactivated carbon will be transported in an enclosed conveyor from the existing reactivation facility to a storage tank located adjacent to the proposed facility and then to a surge hopper within the proposed facility. The reactivated carbon will be fed from the surge hopper into a vibrating screener to separate the material according to particle size.

Equipment utilized for this operation will include product storage tanks and a screener. Forklifts will be used to move the reactivated carbon.

2.A.2.2.5 Auxiliary Equipment

Compressed air required for normal operations will be supplied by two electric powered compressors.

2.A.2.2.6 Dust Collection System

The processing and warehousing building will be equipped with a dust collection system consisting of pick-up points located at those operations that may generate dust. These pick-up points will include the packaging operations, the screener, the acid treatment mixer, and the acid treatment bucket elevator. Any dust collected at these pick-up points will be routed via an engineered ducting system to one of two dust collectors (baghouses). The location of the dust collectors is illustrated on Figure 2-3. The dust collected in the baghouses will be ground to a uniform size and sold as powdered reactivated carbon.

2.A.2.3 Administration Building

A new administration building that will house a reception area, offices, a clean laboratory, a spent carbon laboratory, men's and women's locker rooms, a storage room, a file room, a lunch room, a utility room, and a conference room will be constructed. The location of the new administration building is illustrated on Drawing No. 01-32-001P which can be found in Appendix F. The new administration building will replace three small buildings that currently serve the functions that will be housed in the new administration building. The new administration building will be a 120' by 40' pre-engineered building. It will match the architecture of the other buildings on the site.

2.A.3 Environmental Regulations

The facility is subject to regulation by the United States Environmental Protection Agency (EPA) and CRIT. Federal environmental laws with which the facility must comply include the Clean Water Act (CWA), the Clean Air Act (CAA), the Resource Conservation and Recovery Act (RCRA), and the Emergency Planning and Community Right-to-Know Act (EPCRA).

2.A.3.1 Clean Water Act (CWA)

Wastewater discharges from the facility are subject to the Pretreatment Program (Section 307) of the CWA. Under Section 307, EPA has adopted regulations which apply to all non-domestic discharges into publicly-owned treatment works (POTW). These regulations prohibit the discharge of pollutants that will interfere with the treatment processes at the POTW. WCAI has received an Industrial Wastewater Discharge Permit from the local POTW (Colorado River Sewage System Joint Venture). The current permit allows the facility to discharge 90,000 gallons of wastewater per day (62 gpm) to the POTW which is less than the 144,000 gallons per day (100 gpm) that was anticipated in the initial EA for a 1,000 lb/hr facility. A permit modification request has been submitted to the POTW requesting a 30,000 gallons per day (21 gpm) increase in the allowable discharge rate, although permit limits for the concentration of total dissolved solids (TDS) and total suspended solids (TSS) will not change. The facility discharge will contribute less than 25% of the Colorado River Sewage System Joint Venture's (CRSSJV) allowable TDS limit (see Appendix Q). It is anticipated that a discharge rate of approximately 120,000 gallons per day (83 gpm) will be required to operate the approximately 1200 lb/hr facility, which is still below the 144,000 (52.65 gallons per year or 161.2 acre feet per year) gallons per day evaluated in the initial EA.

The CWA, through its National Pollutant Discharge Elimination System (NPDES) permitting program, regulates the discharge through point sources of stormwater associated with industrial activity. Although, the facility does not have a point source discharge of stormwater, a Notice of Intent (NOI) to discharge stormwater was filed with U.S. EPA in order to inform EPA of the status of the facility with regard to stormwater discharges. On September 29, 1994, U.S. EPA issued a National Pollutant Discharge Elimination System (NPDES) stormwater general permit coverage notice to the facility. This notice is provided in Appendix I. As part of this program, the facility has prepared a Stormwater Pollution Prevention Plan which includes Best Management Practices to prevent the potential introduction of pollutants into the stormwater runoff from the facility.

2.A.3.2 Clean Air Act (CAA)

Air emissions from facility operations must meet the pollutant standards set forth in regulations implementing the Clean Air Act. Because CRIT has not obtained an approved Tribal Implementation Plan (TIP) from U.S. EPA, oversight and enforcement of the CAA on tribal land is by U.S. EPA. CRIT does not have an agreement with the Arizona Department of Environmental Quality (ADEQ) that gives ADEQ jurisdiction over CAA matters on tribal land, thus the regulations found in the state of Arizona's EPA-approved State Implementation Plan (SIP) do not apply to the facility.

However, once the EPA establishes the Indian Air Rule, tribes can choose to implement their own TIP or have USEPA develop and implement a Federal Implementation Plan (FIP).

The potential emissions from the WCAI facility were evaluated to identify the Federal air quality permitting requirements associated with increasing the capacity of the facility. Since the facility is not subject to a federal permit and CRIT has not promulgated a Tribal Implementation Plan to self-regulate air pollution under the CAA, uncontrolled facility emissions were considered. The uncontrolled emissions are those that would occur if no air pollution control equipment were installed at the facility. The uncontrolled emissions represent a worst case condition that will not actually occur because the facility is equipped with sophisticated air pollution control equipment. The facility is not subject to the Prevention of Significant Deterioration (PSD) of Air Quality permitting requirements of the Clean Air Act even when uncontrolled emissions are considered. Thus, no air quality construction permit is required for the proposed expansion. On July 7, 1995, WCAI received concurrence from EPA that the facility is not subject to PSD permitting requirements. The EPA's letter can be found in Appendix B.

The National Emission Standard for Hazardous Air Pollutants (NESHAP) for Benzene Waste Operations found at 40 CFR Part 61, Subpart FF, applies to the facility because the facility receives benzene-containing wastes from facilities to which the NESHAP applies. WCAI submitted an application for approval to EPA for the expansion of the facility to approximately 1200 lb/hr. Per the NESHAP, EPA must approve the expansion because the additional capacity

could result in an increase in benzene emissions from the facility. On August 4, 1995, EPA issued a letter to WCAI approving the proposed modification (expansion to approximately 1200 lb/hr). This approval letter can be found in Appendix C.

Additionally, the facility is subject to the implementing regulations of both the CAA and RCRA. These regulations may address similar subjects and impose similar requirements, however, the facility must be in compliance with both sets of regulations. In the event there are similar requirements, the most stringent of the requirements must be met.

2.A.3.3 Resource Conservation and Recovery Act (RCRA)

At the time of the submittal of the initial EA, the facility was only subject to the RCRA regulations applicable to generators and transporters of recyclable materials. Since the submittal of the initial EA, EPA, in a February 1992 rulemaking, modified its regulations to include carbon reactivation units as regulated units under the treatment, storage, and disposal (TSD) facility standards of RCRA, if they reactivated spent carbon that is classified as a hazardous waste. Because WCAI does reactivate spent carbon that is classified as a hazardous waste, WCAI submitted a RCRA Part A permit application to U.S. EPA Region IX describing storage and treatment of hazardous waste and qualified as an interim status facility under 40 CFR Part 265 in August 1991. The facility currently stores and treats hazardous waste under the Part 265 interim status standards. As discussed in Section 2.A.3.2, EPA has confirmed that the facility currently has an authorized capacity of approximately 1200 lb/hr reactivated product, and it has authorized the phased construction of RF-2 during interim status. In order to maintain interim status the facility must meet the storage and treatment requirements found in 40 CFR Part 265. The requirements include design and management practices that are protective of human health and the environment.

On August 31, 1993, EPA requested that WCAI prepare and submit the RCRA Part B permit application so that EPA could begin the process of fully permitting the facility. WCAI submitted the Part B permit application in January 1995 and this application is currently being reviewed

by the EPA. It is currently anticipated that EPA will issue a permit decision within approximately 8 months after the SEA submission date.

Solid waste generated on site that may be classified as RCRA hazardous is managed as hazardous waste. It is sent, via permitted hazardous waste transporters, to facilities permitted to treat or dispose of RCRA hazardous wastes. The treatment/disposal facility is selected depending on the type of treatment or disposal required. The types of hazardous wastes generated at the facility that are managed as hazardous wastes are those that have come into contact with the RCRA-hazardous spent carbon being processed at the facility. This waste stream consists of items such as gloves, shoe covers, container liners, and maintenance-generated debris.

All non-hazardous solid waste generated at the facility is collected from the site by CRIT. The solid waste is then transported to a transfer station operated by CRIT at the site of the now-closed CRIT Landfill. From the transfer station, the solid waste is transported to the La Paz County Landfill where it is disposed.

2.A.3.4 Emergency Planning and Community Right-to-Know Act (EPCRA)

EPCRA, enacted as Title III of the Superfund Amendments and Reauthorization Act (SARA), gives the general public the right to receive information regarding the presence of chemicals in their communities. The facility is subject to the Section 312 (Tier II) emergency planning and notification requirements of SARA Title III. The facility is not subject to the toxic release inventory (TRI) reporting requirements found in Section 313 of SARA Title III because it is not one of the industrial groupings (based on SIC Codes) required to submit TRI reports.

Under Section 312, the facility is required to determine whether it is subject to the threshold determination reporting provisions, to notify specified entities if it is, and to provide data in emergency situations as well as on a regular basis. Also, because the facility is on Federal land, it must immediately notify the local emergency planning committee (LEPC) and the National

Response Center (NRC) if there is a release of a "reportable quantity" (RQ) of the listed hazardous chemicals that result in off-site exposure.

The facility currently sends copies of the Tier II Emergency and Hazardous Inventory Forms and Material Safety Data Sheets (MSDS) for reportable chemicals to the CRIT Fire Department, the CRIT Environmental Officer, the La Paz County Local Emergency Planning Committee, and the Parker Fire Department on an annual basis. The form notifies these agencies that the facility can have on site at any one time quantities of sulfuric acid and sodium hydroxide that exceed the thresholds established for reporting. The facility is located in the area where the CRIT Fire Department acts as the local emergency planning committee. As such, the CRIT Fire Department would act as the first response agency in the event of an emergency at the facility. If the fire department determined the emergency was of sufficient magnitude that further resources are necessary, they can request the assistance of the other local emergency response resources.

2.A.3.5 Department of the Interior -- Environmental Justice Policy

In a memorandum dated August 17, 1994, the Secretary of the U.S. Department of the Interior (DOI) established an environmental justice policy in response to Executive Order No. 12898. The policy requires DOI to consider the impacts of DOI's actions on minority and low-income populations and communities, as well as the equity of the distribution of benefits and risks of those decisions. The memorandum provides that these considerations should be specifically included in any NEPA documentation.

2.A.3.6 Department of the Interior -- Environmental Compliance Memorandum No. ECM95-2

Secretarial Order No. 3175, dated November 8, 1993, as amended, provides certain guidance to bureaus and offices regarding DOI's responsibilities for Indian trust resources. The Order provides that DOI bureaus and offices, when engaged in the planning of any proposed project or action, will ensure that any anticipated effects on Indian trust resources are explicitly addressed in the planning, decision and operational documents; i.e., Environmental Assessments

(EAs), Environmental Impact Statements (EISs), Management Plans, etc., that are prepared for the project. These documents should clearly state the rationale for the recommended decision and explain how the decision will be consistent with the DOI's trust responsibilities.

2.A.3.7 CRIT Approvals

On February 18, 1994, the Colorado River Tribal Council (CRIT) passed a resolution to support the development of the facility to the limits described in the RCRA Part A application and the initial EA. This resolution is included as Appendix J.

On July 20, 1995, CRIT issued a building permit which authorized construction of the proposed product packaging building (i.e., the processing and warehousing building). A copy of the building permit is included as Appendix K.

2.A.4 Transportation

2.A.4.1 Reactivation Capacity Expansion

Spent activated carbon is transported to the facility from locations throughout the U.S. It is anticipated that these shipments will be transported via the Federal Interstate. The spent activated carbon as well as the reactivated carbon product is received and shipped utilizing three axle type tractors. The trailers hauled by the tractors may be one of four types -- flatbeds, roll-offs, slurry tanks, or box vans. Bulk shipments are via self-contained roll-offs or slurry tanks, while containerized shipments are via flatbeds or box vans. The containers transported by flatbeds or box vans are covered at all times during shipment and the containers are secured in place. Only transporters permitted by U.S. EPA and/or the U.S. Department of Transportation are allowed to haul the type of materials received at and shipped from the facility.

Truck deliveries and pickups will generally occur only during daylight hours. The initial EA anticipated that a total of six truck trips per week would be required to deliver spent carbon to the facility. Actual operating experience indicates that for a 1,000 lb/hr facility an average of

nine truck trips per week will be required to deliver spent carbon to the facility. Based on actual operating experience, it is anticipated that after the proposed expansion to approximately 1200 lb/hr, an average of ten truck trips per week will be required to deliver spent carbon to the facility -- an increase, on average, of one truck trip per week.

2.A.4.2 Processing and Warehousing Facility

Approximately seventy-five percent of the trucks that deliver spent carbon to the facility are used to ship reactivated product from the facility. Therefore, additional truck trips are required to ship the remaining reactivated product from the facility. For both a 1,000 lb/hr facility and a approximately 1200 lb/hr facility, 2 to 3 truck trips per week, on average, are required for shipping the additional reactivated carbon. Therefore, the total truck traffic associated with the approximately 1200 lb/hr facility is expected to average 12 to 13 truck trips per week.

2.B ALTERNATIVES TO PROPOSED ACTION

2.B.1 Alternative 1

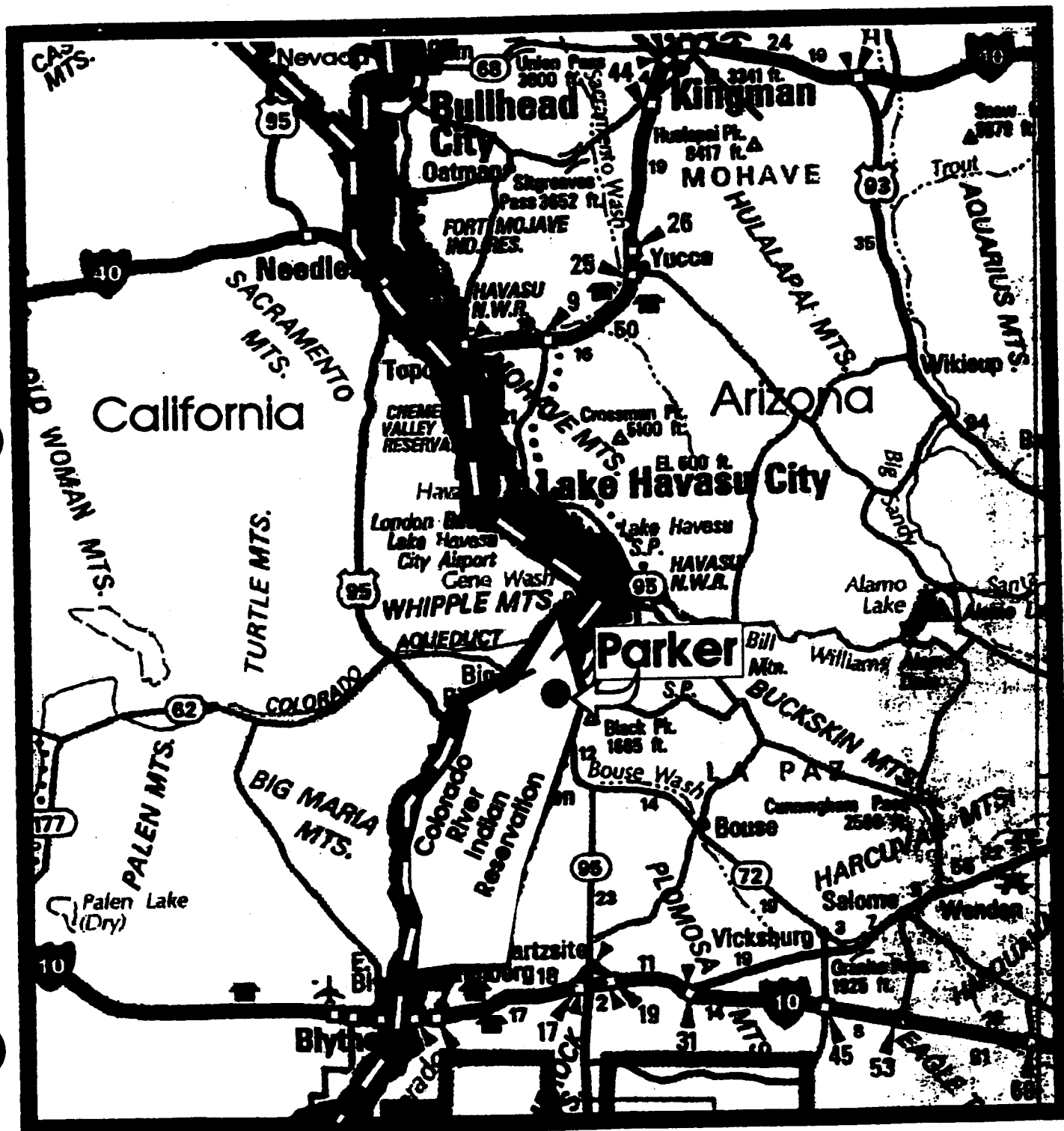
This alternative differs from the Proposed Action in that the acid treatment operations which are currently being performed in the Los Angeles, California area would not be relocated to the Parker, Arizona site. The processing and warehousing building would still be constructed because it is an essential component of the carbon reactivation business.

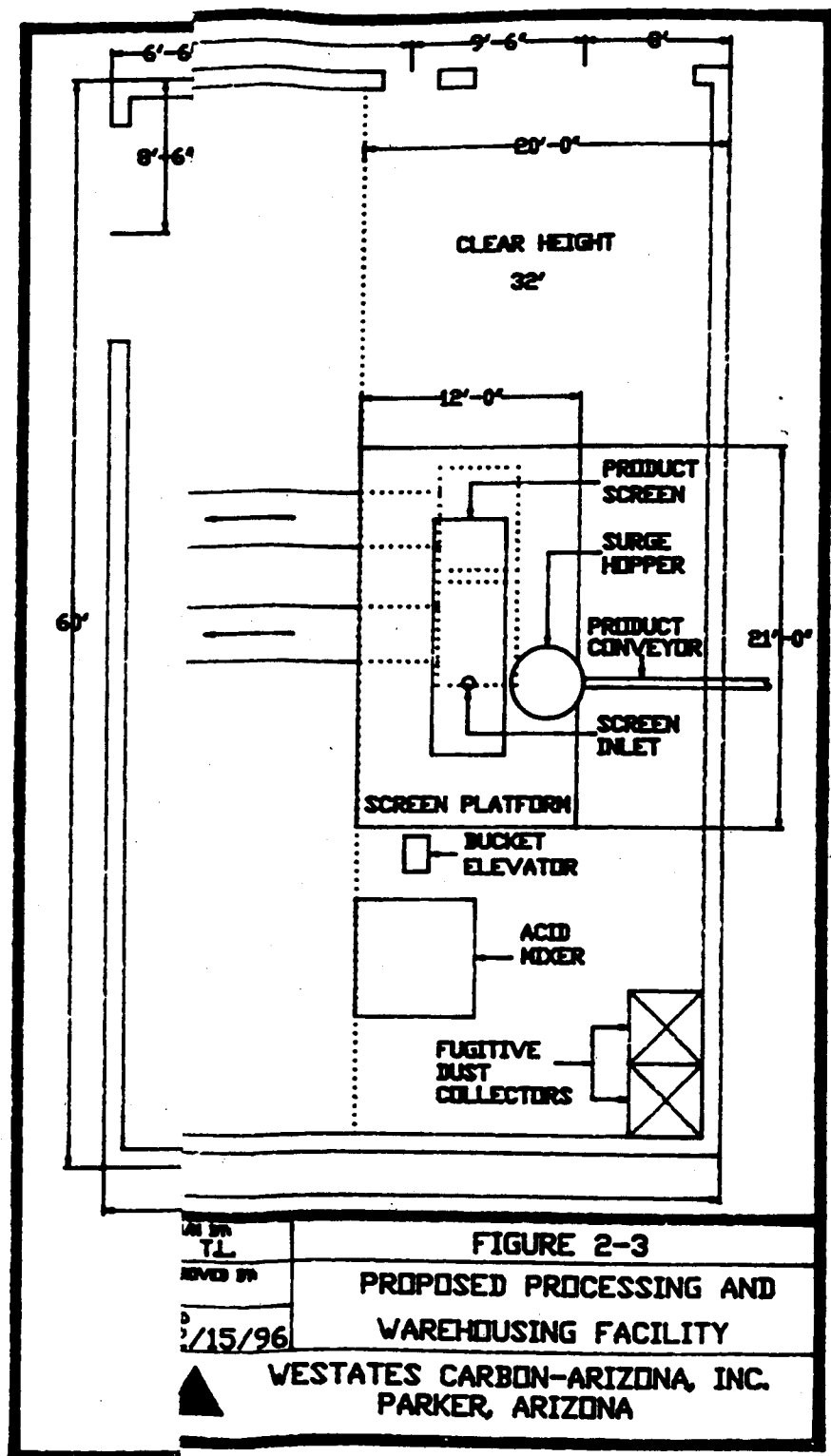
2.B.2 No-Action Alternative

NEPA regulations state that a No Action Alternative shall be considered. The No Action Alternative has been interpreted to mean that the proposed actions would not be implemented. The No Action Alternative assumes that the capacity of the facility would not be increased from 1,000 lb/hr to approximately 1200 lb/hr. The No Action Alternative also assumes that acid treatment operations would not be relocated to Parker, Arizona.



**FIGURE 2-1
LOCATION MAP
PARKER/COLORADO RIVER
INDIAN RESERVATION**





CHAPTER 3

DESCRIPTION OF AFFECTED ENVIRONMENT

This chapter in the initial Environmental Assessment described the existing environment at the facility location. Included was information on land features, geologic setting, soils, water resources, and air quality. The living resources described included wildlife, vegetation, ecosystems and adjacent agricultural resources. The available cultural, historical and archeological information for the site was also discussed. As noted in the following sections, the affected environment is the same as that described in the initial EA, with the exception of the socioeconomic and sociocultural environment. Section 3.C has been revised to include more recent socioeconomic information than that provided in the initial EA. Section 3.E has been added to address Public Health and Safety and Section 3.F has been added to address Environmental Justice and Secretarial Order 3175. These subjects were not addressed in the initial EA.

3.A PHYSICAL ENVIRONMENT

3.A.1 Climate

The description of the climate is unchanged from that described in the initial EA. Wind speed and directional data in the form of wind roses have been included as Appendix O.

3.A.2 Air

The descriptions of air quality and noise levels are unchanged from those described in the initial EA.

3.A.3 Water

The descriptions of groundwater resources and water quality are unchanged from those described in the initial EA.

3.A.4 Geology

The descriptions of regional physiography, geology, soils, and land use are unchanged from those provided in the initial EA.

3.A.5 Transportation Network

The description of the transportation network is unchanged from that described in the initial EA.

3.B BIOLOGICAL ENVIRONMENT

The description of desert flora, desert fauna, unique biological resources, unique ecosystems, and endangered species are unchanged from those described in the initial EA.

3.C SOCIOECONOMIC AND SOCIOCULTURAL ENVIRONMENT

3.C.1 Parker, Arizona

The economy of Parker is based primarily on retail trade and services associated with the recreational facilities located along an 11-mile strip of the Colorado River contained between Parker Dam and Headgate Rock Dam. Parker also serves as the trade center for the Colorado River Indian Reservation and small towns along the Colorado River.

Agriculture is also important to the economy of Parker. Water from the Colorado River is used to irrigate approximately 84,500 acres of land in the Colorado River Indian Reservation. The fertile fields yield crops of melons, cotton, wheat, barley, alfalfa and lettuce. The town of Parker has an Industrial Park, zoned for light and heavy industry with sites ranging from 5 to 38 acres. The Colorado River Indian Tribes own a 100 acre Industrial Park located on the CRIT reservation adjacent to the town of Parker. The CRIT Industrial Park has sites ranging from 2.7 to 12 acres with easy truck, rail and air access and all utilities available.

The unemployment rate in 1994 for Parker, Arizona was 10.6 percent. According to the U.S. Bureau of Census, Parker had a population of 2,920 in 1994. A comprehensive community

profile of Parker, which includes the population of La Paz County (16,075), was developed by the Arizona Office of Economic Planning and Development and is provided in Appendix D.

3.C.2 Colorado River Indian Reservation

The Colorado River Indian Reservation covers a total area of 268,691 acres in parts of southwestern Arizona and southeastern California. Parker is the largest town on the Reservation. Other communities on the Reservation include Big River, California and Poston, Arizona. Indians of the Mohave, Chemuhuevi, Navajo, and Hopi tribes live on home sites scattered throughout the Reservation area. Agriculture is the primary industry on the Reservation. It occupies approximately 84,500 acres, with an additional 23,300 acres available for development. Employment for area Indians is as denoted in the table below. The population of the reservation was 1,836 in 1994 with a potential labor force of approximately 607. There are approximately 3,126 total enrolled tribal members living on and off the reservation. Unemployment on the Reservation at the same time was 14.4%. The Reservation employment structure and labor force are shown below.

COLORADO RIVER INDIAN RESERVATION EMPLOYMENT STRUCTURE

Agriculture	14.4%
Commercial-Industrial	1.4%
Outdoor Recreation	1.6%
Government Employment	73.3%
Off-Reservation Employment	9.3%

Source: Colorado River Indian Tribe Planning Department

LABOR FORCE DATA

	<u>1980</u>	<u>1990</u>	<u>1994</u>
Civilian Labor Force	609	2,831	3,016
Employed	406	2,602	2,583
Unemployed	321	229	433
Unemployment Rate	33.3 %	8.1 %	14.4 %

Source: Bureau of Indian Affairs, Information Profiles,
Colorado River profile of the Colorado River Indian Reservation is included.

A detailed community profile of the Colorado River Indian Reservation is included in Appendix E.

3.D HISTORIC AND ARCHEOLOGICAL FEATURES

The description of historic and archeological features is unchanged from that described in the initial EA. The description was based on an archeological survey of the entire 10-acre site in 1991. Also at that time, compliance with the National Historic Preservation Act and consultation requirements (Section 106) was completed (see Appendix L).

3.E PUBLIC HEALTH AND SAFETY

WCAI's existing carbon reactivation facility is the only tenant of the CRIT Industrial Park. It has been operating on the site since August 1992 without any threat to the public health and safety.

3.F ENVIRONMENTAL JUSTICE AND SECRETARIAL ORDER 3175

WCAI's existing carbon reactivation facility is located in the CRIT Industrial Park. The location and operation of the facility is approved by CRIT per a lease agreement (See Chapter 1). This lease was approved based on the issuance of a Finding of No Significant Impact (FONSI) by BIA. The basis of the FONSI was a publicly available Environmental Assessment document.

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

This chapter describes the potential environmental impacts of the Proposed Action and alternative actions, including information on the potential construction and operational impacts. Table 4-1 provides a summary of the environmental impacts for the Proposed Action and other alternative actions.

4.A IMPACTS ON THE PHYSICAL ENVIRONMENT

4.A.1 Climate

The Proposed Action and alternative actions will have no effect on the general climate of the area.

4.A.2 Air

4.A.2.1 Quality

Proposed Action. The air quality at the site may be temporarily affected by dust during the construction phase of the processing and warehousing facility. No residential areas are adjacent to the site. These impacts are not expected to be significant.

The expanded facility will not be a major source of air emissions pursuant to the Federal Prevention of Significant Deterioration Regulations. As described in Section 2.A.2.1.9, there will be a minor incremental increase in the emissions associated with the increase in capacity from 1,000 lb/hr to approximately 1200 lb/hr. Air pollution control equipment at the facility is designed and will be operated to ensure that no significant impacts on ambient air quality will result from the increased capacity. A continuous emissions monitor (CEM) is employed to monitor carbon monoxide and oxygen directly after the APC equipment. See Sections 2.A.2.1.5 and 2.A.2.1.7 for a description of the air pollution control equipment and monitoring devices.

Additionally the facility has performed an air quality modeling analysis based on the stack exhaust. The results of this modeling are the basis of the Health Risk Assessment which is included in the Part B permit application.

The handling of activated carbon in the proposed processing and warehousing facility will generate dust. All operations that have the potential to generate dust will be performed in areas equipped with a dust collection system (See Section 2.A.2.2.6). This will ensure that no significant impacts on ambient air will result from the operations performed in the proposed packaging and warehousing facility.

Alternative No. 1. When compared to the Proposed Action, this alternative would avoid the minor dust related emissions associated with the operation of the proposed acid treatment process.

No Action Alternative. When compared to the Proposed Action, this alternative would avoid the minor dust related emissions associated with the operation of the proposed acid treatment process and the incremental emission increases associated with the increased capacity of the reactivation facility.

4.A.2.2 Noise

Proposed Action. The Proposed Action would contribute to direct and indirect noise level effects associated with the facility. However, none of the noise level increases associated with the Proposed Action will have a significant impact on neighboring properties.

Noise impact assessments generally consider (1) the extent to which people will be adversely affected, and (2) the ability of the proposed facility to comply with the applicable governmental standards, laws or regulations. Since there are no known noise standards that are applicable to this facility, the appropriate focus is the potential impacts to people in the vicinity of the facility. The following factors were considered:

- existing noise levels prior to implementing the Proposed Action;
- the location of potential noise sensitive land use receptors relative to the facility site;
- noise propagation characteristics associated with the Proposed Action; and
- the implications associated with the change in noise levels resulting from the Proposed Action.

The initial EA discussed the noise related impacts associated with the initial construction and operation of the facility, as well as potential traffic related impacts. According to that document the annual average background noise levels in the vicinity of the facility were 65 to 69 dBA before the facility was constructed. Truck traffic on nearby Highway 95 was the primary contributor to the background noise levels.

The following table presents the results of noise monitoring that was performed at the existing facility on December 27-28, 1995. The data was collected using Quest Micro-15 noise meters configured for community noise monitoring (Code 724). The meters were placed at midpoints along the plant boundary fencing and at the southwest corner of the leased property adjacent to Mutahar Street. The noise meters were field calibrated before and after monitoring using a Quest QC-10 calibrator. The monitoring was conducted for a twenty-four hour period beginning at approximately 4:00 PM on December 27, 1995. The facility was operating normally throughout the monitoring period, and a truck delivering spent carbon was received and unloaded during the monitoring period. The results are presented as A-weighted, Leq(24) noise levels. A-weighted noise levels indicate that the measurement instrument processes the sound pressure levels at different frequency bands in a manner that simulates the overall hearing response of the human ear. The U.S. EPA has determined that A-weighting is an appropriate method of obtaining a measure of noise proportional to its potential for affecting people (EPA 1974). Leq refers to the equivalent sound level and represents the steady sound level that has the same energy as the actual time-varying sound. Noise standards are often expressed as a Leq. A twenty-four hour averaging period was used because the facility operates on a continuous, 24-hour basis.

MONITOR LOCATION	NOISE LEVEL [Leq(24)]
North Fence Midpoint	59 dBA
East Fence Midpoint	68 dBA
South Fence Midpoint	72 dBA
West Fence Midpoint	60 dBA
Southwest Corner (Adjacent to Mutahar Street)	62 dBA

Based on these monitoring results, the noise levels at the property lines are generally consistent with the background noise levels reported in the initial EA.

The facility is located in an industrial park and it is currently the only tenant in the park. There are no residences within 1 mile of the facility. Additional existing sources of noise in the vicinity of the facility include a rail line located approximately 1400 feet west of the facility and an airport located approximately 4500 feet north of the facility. It is estimated that approximately 4 to 6 freight trains pass by the site each day and approximately 15 to 20 small planes use the airport daily. As described in the initial EA, the closest noise receptors would be the individuals working in the offices located near the corner of Shea Street and Mutahar Street. These offices are located approximately 920 feet southwest of the facility. As illustrated on Figure 2-2, Highway 95 is located approximately 1600 feet west of the offices and the railroad tracks are located approximately 100 feet west.

As described in Appendix N, the potential increase in noise associated with the Proposed Action was evaluated. The noise monitoring results described above represent the measured noise levels associated with the facility operating at a nominal capacity of approximately 600 lb/hr. Since the new equipment that is being added at the facility is similar in design and quality in terms of noise emissions, an increase in capacity to approximately 1200 lb/hr should result in a maximum 3 dBA increase in noise levels at the office building.

A change in outdoor noise level of 3 decibels is considered to be "just discernible" by noise people (Bolt Beranek and Newman, Inc., 1973). For the workers in the office building, the

change would be much less than 3 decibels because of the attenuation of the office building walls. The presence of normal office background noise would also mask any residual contribution of facility noise through the office wall system. Therefore, the resulting noise impact of increasing the facility capacity to approximately 1200 lb/hr, in terms of equipment noise, is expected to be negligible. The potential noise impacts associated with the relocation of the reactivated carbon processing and packaging operations are also expected to be negligible because they will be located within the processing and warehousing building.

The Proposed Action will also increase the number of truck trips. The initial EA anticipated that a total of six truck trips per week (approximately one per day) would be required to deliver spent carbon and remove finished product. The total number of trucks associated with the expanded approximately 1200 lb/hr facility is expected to be two per day or approximately 12 to 13 truck trips per week. The change from one to two truck trips per day in the vicinity of the office building would not have a significant effect on the office work environment because traffic is a major contributor to the existing background noise and the facility related traffic represents a very small percentage of the total traffic volume in the vicinity of the office building.

The construction related noise is not expected to be any greater than the noise associated with the initial construction activities. There are no new sensitive noise receptors. Therefore, these impacts are not considered significant because the expected construction noise levels would be comparable to the background levels associated with traffic on Highway 95.

Alternative No. 1. From a noise standpoint, this alternative would be the same as the Proposed Action.

No Action Alternative. From a noise standpoint, the No Action Alternative would be the same as Alternative No. 1.

4.A.3 Water Resources

4.A.3.1 Water Sources (Surface and Groundwater)

Proposed Action. Water usage as a result of the Proposed Action will not be greater than the water usage estimated in the initial EA. At approximately 1200 lb/hr, the water usage would fluctuate between 70 and 130 gallons per minute. However, total facility water usage will remain at or below the average 100 gallons per minute estimated in the initial EA. This equals 52.6 million gallons per year or 161 acre-feet per year. This represents no change from what was considered in the initial EA.

Under the terms of the lease agreement, water will be supplied by CRIT. Water usage at the expanded facility and processing and warehousing operations would equal 0.022 percent of CRIT's annual water supply of 717,000 acre-feet. This usage would not constitute a significant reduction of CRIT's water supply.

Impacts to the floodplains affected by the proposed alternative have been evaluated in accordance with Executive Order 11988. The facility is not located within a 100-year floodplain. Data supporting this fact was taken from the Flood Insurance Rate Map for the Colorado River Indian Reservation.

It has been determined that no wetlands will be affected. Appendix P includes a letter from the Department of the Army, U.S. Corps of Engineers where a determination had been made that the project is not subject to jurisdiction under Section 404 of the Clean Water Act and therefore no Section 404 permit is required. It has also been determined that a 401 water quality certification from EPA is not required.

Alternative No. 1. Since the acid treatment process does not involve an increase in water usage, it does not differ from the Proposed Action with respect to water usage. Therefore, neither the Proposed Action nor Alternative No. 1 will involve an increase in water usage when compared to the initial EA.

No Action Alternative. There is no significant difference between the Proposed Action and the No Action Alternative with respect to water usage.

4.A.3.2 Water Quality

Proposed Action. Since the facility is designed and will be operated to prevent uncontrolled releases, any potential negative impacts to groundwater or surface water resulting from facility expansion and processing and warehousing operations would relate to wastewater discharges. Wastewater discharges from the reactivation facility are less than the service water usage described in Section 4.A.3.1 because of the evaporative losses that occur in the air pollution control equipment. While the increase in capacity to approximately 1200 lb/hr will result in an increase in the wastewater discharged from the facility, the total discharge will remain below the quantity described in the initial EA for the 1,000 lb/hr facility. Discharges from the processing and warehousing facility would be limited to sanitary wastewaters. The wastewater generated as a result of the Proposed Action will be discharged into the sewer system operated by the CRSSJV. Discharges would be in accordance with the facility's Industrial Wastewater Discharge Permit. The current permit allows the facility to discharge 90,000 gallons of wastewater per day (62 gpm) to the POTW. A permit modification request has been submitted to the POTW requesting a 30,000 gallons per day (21 gpm) increase in the allowable discharge. It is anticipated that a discharge rate of 120,000 (83 gpm) gallons per day will be required to operate the facility at approximately 1200 lb/hr, which is less than the 144,000 (100 gpm) gallons per day that was anticipated in the initial EA for a 1,000 lb/hr facility. The 30,000 gallons per day increase is not considered to be a substantial increase in relation to the total flow currently handled by CRSSJV.

Wastewater discharged from the facility contains total suspended solids (carbon dust with trace amounts of metals), total dissolved solids (salts), and trace amounts of organic materials. As illustrated in Appendix Q, the concentrations of these constituents are not significant when compared to the influent of the POTW. Concentrations of these materials are not expected to increase because of the increase in reactivation capacity or operation of the processing and warehousing facility and will be monitored in accordance with the Industrial Wastewater

Discharge Permit. The modified permit discharge limitation will include the sanitary wastewater generated at the processing and warehousing facility.

Although, the facility does not have a point source discharge of stormwater, a Notice of Intent (NOI) to discharge stormwater was filed with U.S. EPA in order to inform EPA of the status of the facility with regard to stormwater discharges. As part of this program, the facility has prepared a Stormwater Pollution Prevention Plan which includes Best Management Practices to prevent the introduction of pollutants into the stormwater runoff from the facility. On September 29, 1994, U.S. EPA issued an NPDES stormwater general permit coverage notice to the facility. This notice is provided in Appendix I.

Alternative No. 1. With respect to water quality, there would be no difference between the Proposed Action and Alternative No. 1.

No Action Alternative. There is no significant difference between the Proposed Action and the No Action Alternative with respect to water quality.

4.A.4 Land Resources

4.A.4.1 Topography and Physiography

Proposed Action. The capacity increase component of the Proposed Action would not result in the altering of any additional topography or physiography. The processing and warehousing component of the Proposed Action will result in the disturbance of approximately three additional acres of land within the property currently leased to WCAI. The disturbance would result in the altering of the existing topography and physiography from the grading activities during construction. There is very little topographic relief within the leased site, therefore, no significant impacts are expected.

Alternative No. 1. With respect to topography and physiography there would be no difference between the Proposed Action and Alternative No. 1.

Arizona Department of Commerce

Community Profile

Colorado River Indian Reservation

Colorado River Indian Reservation

lands are in Arizona (225,995 acres) and California (42,696 acres). Tribal lands are low arid desert and river bottom with abrupt mountain ranges. The Colorado River provides 90 miles of shoreline running north to south along the reservation.

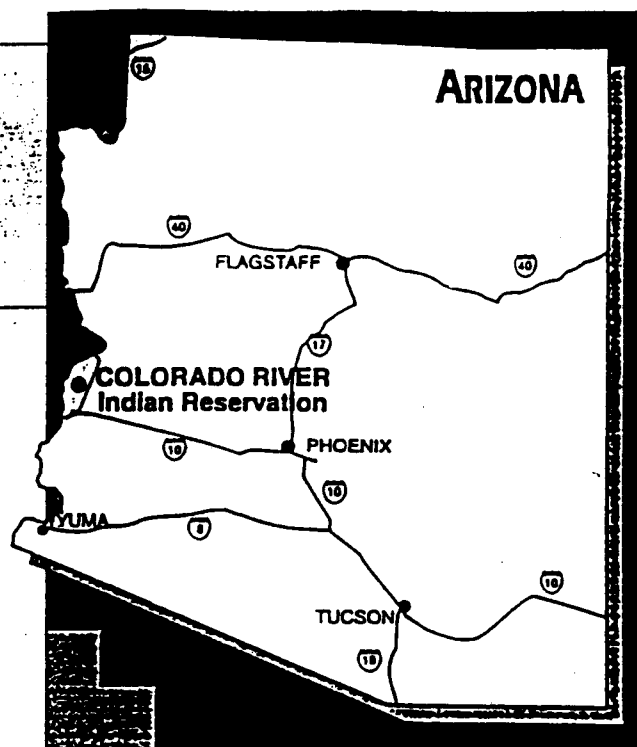
In 1864, Charles Debrille Poston, the first Indian superintendent for Arizona, selected the area as Arizona's second Indian reservation. It was established March 3, 1865, for the "Indians of said river and its tributaries." The Mohave have inhabited the area for centuries, while members of the Chemehuevi, Hopi, and Navajo tribes relocated to the reservation later.

The incorporated community of Parker is located on and surrounded by reservation lands. A second community, Poston, is located on the reservation, 20 miles south of Parker.

PRINCIPAL ECONOMIC ACTIVITIES

The reservation economy is centered around agriculture, recreation, government and light industry, which is expanding. The fertile river-bottom lands and available water allow irrigated agriculture which produces cotton, alfalfa, wheat, feed grains, lettuce, and melons. Approximately 84,500 acres are now under cultivation and another 50,500 are available for development.

The Colorado River is the basis of an established recreation and tourism industry. Marinas, lodging facilities, food and beverage establishments, beaches, mobile home parks, and cabanas have been built. Recreational development leases and homesite leases are available. In addition, the Blue Water Casino opened in April 1995 and employs over 250.



SCENIC ATTRACTIONS

The Colorado River, dams and lakes, is the reservation's greatest recreational and scenic attraction. Lakes Moovalya and Havasu are formed behind Headgate and Parker Dams. Facilities for swimmers, boaters and water-skiers may be found along the shoreline. Fishing for trout, striped bass, bass, catfish, crappie and bluegill is excellent in the river. Dove, quail, waterfowl, rabbit and predator hunting is excellent. Reservation hunting and fishing permits are required.

Tribal occupation of the area is evidenced by petroglyphs, pictographs, ancient trails and intaglios. The Tribal Museum and Library attempt to preserve and interpret the heritage of each of the four tribes of the reservation as well as the general history of the area. Through the Museum, the tribes maintain two national historic sites, the Old Mohave Presbyterian Mission and the Old Arizona frontier community of La Paz, Arizona. These are open to the public.

POPULATION

	1980	1990	1994
Colorado River Indian Reservation (members)	2,504	3,035	3,127
La Paz County	12,557	13,844	16,075
Arizona	2,716,546	3,665,228	4,071,650

Sources: Arizona Department of Economic Security; U.S. Census Bureau; Colorado River Indian Tribe, Enrollment Department; Arizona Statistical Review, 1994.

LABOR FORCE DATA

	1980	1990	1994
Civilian Labor Force	609	2,831	3,016
Employed	406	2,602	2,583
Unemployed	321	229	433
Unemployment Rate	33.3%	8.1%	14.4%

Source: Arizona Department of Economic Security and Bureau of Indian Affairs (BIA)

GROWTH INDICATORS

	1990	1993	1994
Postal Receipts (\$)*			
(Parker)	637,147	686,367	711,998
Parker Unified School District	2,332	2,622	2,667

*Postal receipts are for fiscal year.

Colorado River Indian Reservation

TAXES

The State of Arizona does not tax Indian lands and Indian-owned property on reservations. Incomes of Indians residing on reservations are not taxed by the State if wholly derived from reservation sources. The Federal Government does not exempt individual Indians from income or other federal taxes. Indian people of Arizona are also exempt from state and local sales taxes on consumer goods purchased on the reservation, unless such taxes are imposed by the tribal government. However, the State of Arizona collects taxes from reservation residents on sales of gasoline, electricity, natural gas, and telephone service.

Source: Arizona Property Tax Rates and Assessed Valuation.

COMMUNITY FACILITIES

The Colorado River Indian Reservation offers a wide range of community facilities including a library-museum, two gymnasiums, two parks, two baseball diamonds, a fairgrounds, community center, rodeo grounds, and a marina with trailer park, beaches, cabanas, and picnic area.

Special events include National Indian Days and Miss Indian Arizona Pageant in September and All-Indian Rodeo in December.

Communication. In addition to communication resources from the rest of the state, the community has a local area weekly newspaper, radio stations from Lake Havasu City, one local television channel from Parker, and eleven additional channels via cable and satellite.

educational. All reservation children attending local public schools attend the Parker Unified School District.

Arizona Western College (in Yuma) and Northern Arizona University (in Flagstaff) offer extension courses at the Parker High School and the Tribal Educational Service Center.

Medical. There is one hospital with 20 beds and laboratory, X-ray, emergency room facilities, four physicians, one dentist, seven community health representatives, two field nurses, a health educator, and a sanitarian available. Additional medical facilities and services are available in Parker.

Financial. There are five financial institutions with local branch offices located in nearby Parker. For information about state financial programs, contact the Arizona Department of Commerce, (602) 280-1300.

Governmental. The community is governed by a chairman, vice chairman, and council members. There is a local police department and a fire department with 27 volunteers.

Airport. Residents have access to the Avi Suquilla Airport which has a lighted, 4,800-foot runway, UNICOM, radio and fuel.

Industrial Properties. The 140-acre Colorado River Tribes Industrial Park is fully improved with paved streets, all utilities and rail, air, and highway access. Contact the Colorado River Indian Tribes Resources Development Committee.

Utilities

Electricity:	Bureau of Indian Affairs	(520) 669-7173
	Arizona Public Service	669-2248
Natural Gas:	Southwest Gas Corporation	669-2228
Telephone:	Continental Telephone Co.	669-2221
Water:	CRIT Regional Water System	669-9211
Sewer:	Jointly operated by Tribes and Parker	

WEATHER

Month	Average Temperature (°F)		Average Total Precipitation (Inches)	Month	Average Temperature (°F)		Average Total Precipitation (Inches)
	Daily Max.	Daily Min.			Daily Max.	Daily Min.	
January	67.3	37.1	0.53	August	106.7	78.2	0.56
February	72.9	41.7	0.32	September	102.5	70.2	0.26
March	78.7	46.6	0.52	October	91.4	57.8	0.29
April	87.0	53.6	0.22	November	77.5	44.9	0.32
May	95.3	61.9	0.03	December	68.3	38.1	0.46
June	103.3	69.6	0.01				
July	108.6	78.8	0.30	Year	88.3	56.5	3.82

Average Total Snow, Sleet and Hail Annually: Trace

Source: Parker Weather Reporting Station, elevation 425 ft.

This profile was prepared by the Arizona Department of Commerce Communication and Research Division in cooperation with the Colorado River Indian Tribes Planning Department.

For further information, contact:

Colorado River Indian Tribes
Rt 1 - Box 23-B
Parker, AZ 85344
(520) 669-9211

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6/95

No Action Alternative. Implementation of the No Action Alternative would avoid the disturbance of 3 acres of industrially zoned land.

4.A.4.2 Geologic Setting

Proposed Action. Given the current land use of the leased property, the addition of the processing and warehousing facility would have a negligible impact. There would be no impact associated with the increased capacity.

Alternative No. 1. There would be no difference between the Proposed Action and Alternative No. 1 with respect to the geologic setting.

No Action Alternative. The Proposed Action and the No Action Alternative are not materially different with respect to the geologic setting.

4.A.4.3 Soils

Proposed Action. The capacity increase component of the Proposed Action would not result in the disturbance of any additional land area. The processing and warehousing component of the Proposed Action will result in the disturbance of approximately three additional acres of land within the property currently leased to WCAI. While the processing facility is under construction, blowing sand could occur during periods of high winds. No significant erosion is anticipated to result from construction activities. The type of soil to be disturbed during construction is classified as Superstition series, which is a gravelly loamy fine sand that develops on zero to three percent slopes.

Alternative No. 1. There would be no difference between Alternative No. 1 and the Proposed Action with respect to soils.

No Action Alternative. The potential erosion related to the construction of the processing and warehousing facility would be avoided if the No Action Alternative were implemented.

4.A.4.4 Land Use

Proposed Action. Land use impacts associated with the Proposed Action would be negligible because the action will take place within the boundaries of the currently leased land which is zoned for industrial use.

Alternative No. 1. With respect to land use, Alternative No. 1 would not differ materially from the Proposed Action.

No Action Alternative. The No Action Alternative would not differ materially from the Proposed Action with respect to land use.

4.A.5 Transportation Network

Proposed Action. The Proposed Action will not cause a significant traffic related impact on area roads and highways. Increased traffic would occur on State Highway 95 and on the access roads to the proposed site, Mojave Road, Shea Road and Mutahar Street.

Experience has shown that approximately 50 percent of the traffic to the site uses Mohave Road to reach Mutahar Street from Highway 95, while the remaining 50 percent uses Shea Road from Highway 95 to Mutahar Street. The site access road is located on Mutahar Street.

An average of approximately 12,800 vehicles per day currently travel along Highway 95 in the vicinity of the facility (Pike, 1996). It is estimated that approximately 300 of these vehicles are trucks (Andrew, 1996). Therefore, the total facility vehicular traffic represents a very small percentage of the traffic on Highway 95.

The facility related traffic represents a much high percentage of the traffic on the access roads because Mojave, Shea and Mutahar are low volume roads. However, the potential impacts along these roads are minimal because they traverse areas that are generally undeveloped. There are no residences along any of these roads. The only developed land uses are two offices located near the corner of Shea Road and Mutahar Street. The increased truck traffic may

accelerate deterioration of the low volume roads. This deterioration will be a long-term effect which can be handled with routine road maintenance activities.

During the construction phase, traffic would include construction equipment and construction workers. These impacts would be short-term. Post-construction impacts would include increased traffic from facility employees and trucks delivering spent carbon and picking-up reactivated product. As discussed in Section A.C, WCAI expects that the Proposed Action will result in the hiring of approximately 4 new fulltime employees. Truck traffic during operations of the approximately 1200 lb/hr facility (deliveries/pick-ups) will increase by an average of 1 or 2 truck trips per week when compared to a 1,000 lb/hr facility. The traffic impacts associated with an increase of four additional employee vehicles per day and 1 to 2 additional truck trips per week will not significantly impact the traffic patterns currently encountered on Highway 95, Mojave Road, Shea Road or Mutahar Street.

Alternative No. 1. The potential traffic related impacts associated with the acid treatment process would be limited to periodic deliveries of acid to the site (e.g., one to two deliveries per month). These minor impacts would be avoided if Alternative No. 1 were not implemented.

No Action Alternative. The minor traffic related impacts associated with the construction and operations of the expanded facility would be avoided if the No Action Alternative were implemented.

4.B IMPACTS ON THE BIOLOGICAL ENVIRONMENT

4.B.1 Analysis of Impacts of Flora

Proposed Action. When compared to the initial EA, no additional flora, including threatened and endangered species, will be impacted by the Proposed Action because the action will take place within the boundaries of the leased property. The entire ten acres of the leased property were addressed in the initial EA.

Alternative No. 1. With respect to flora, there is no difference between the implementation of Alternative No. 1 and the implementation of the Proposed Action.

No Action Alternative. Implementation of the No Action Alternative would not be different than the implementation of the Proposed Action with respect to flora, because all activities will occur within the leased property.

4.B.2 Analysis of Impacts of Fauna

Proposed Action. When compared to the initial EA, no additional fauna, including threatened and endangered species, will be impacted by the Proposed Action because the action will take place within the boundaries of the leased property. The entire ten acres of the leased property were addressed in the initial EA.

Alternative No. 1. Implementation of Alternative No. 1 would not be different than the implementation of the Proposed Action with respect to fauna.

No Action Alternative. With respect to potential impacts on fauna, implementation of the No Action Alternative would not be different than the implementation of the Proposed Action.

4.C IMPACTS ON THE SOCIOECONOMIC AND SOCIOCULTURAL ENVIRONMENT

Proposed Project. The Proposed Action facility will provide additional employment opportunities for the CRIT labor force. In addition to the construction jobs, WCAI expects that the Proposed Action will result in the hiring of approximately 4 new full-time employees (total of 28 employees) .

The initial EA estimated that the facility would have approximately 17 fulltime employees. Experience has shown that more employees are required to operate the facility than were originally estimated. The facility currently employs 21 people. WCAI intends to add approximately four new positions when the installation of RF-2 is complete, and it is anticipated that approximately 28 people will ultimately be required to operate the expanded approximately 1200 lb/hr facility with the processing and warehousing facility. Approximately four of these new positions are related to the increase in capacity from 1000 lb/hr to approximately 1200 lb/hr and the operation of the processing and warehousing facility. As a

condition of the lease agreement, WCAI agrees to give employment preference to Indians.

Alternative No. 1. With regard to employment opportunities, Alternative No. 1 would not be different than the Proposed Action, because the addition of the acid treatment process would require less than one additional fulltime employee.

No Action Alternative. The No Action Alternative would result in the loss of potential employment opportunities for the CRIT labor force.

4.D IMPACTS ON HISTORIC AND ARCHEOLOGICAL FEATURES

Proposed Action. Historic and archaeological features will not be impacted by the Proposed Action because the action will take place within the boundaries of the leased property. The entire ten acres of the leased property were addressed in the initial EA. Additional Section 106 consultation with the Arizona State Historic Preservation Office may be required if any historic and/or archaeological features are discovered during construction activities.

Alternative No. 1 The implementation of Alternative No. 1 would have no impact on historic and archaeological features.

No Action Alternative. The implementation of the No Action Alternative would have no impact on historic and archaeological features.

4E. PUBLIC HEALTH AND SAFETY

Proposed Action. Public health and safety will not be impacted by the Proposed Action because of the types of materials processed at the facility, the emission control measures, or the emergency preparedness and response procedures utilized at the facility.

The facility is equipped with emission control equipment (see Sections 2.A.2.1.5 and 2.A.2.1.7)

to control the potential emission of volatile organic compounds, particulate matter, sulfur dioxide and acid gases into the atmosphere. Additionally, the reactivation process -- from acceptance at the facility to shipment of reactivated product -- takes place in an essentially enclosed system. Areas that are prone to potential dusting are equipped with dust suppression or dust collection systems (see Section 2.A.2.2.6.). Tanks in which spent carbon or the water used to transport the spent carbon is stored are equipped with carbon adsorption systems to collect any organic vapors that may be vented from the tanks due to working or breathing losses. All of these abatement systems are monitored to ensure they are in proper working order. The entire process area, as well as the hazardous spent carbon storage area is in secondary containment to prevent the release of materials to the environment from spills.

The facility has a formal equipment inspection program that includes a protocol for dealing with any deficiencies found during the periodic inspections. Additionally, the facility has developed a contingency plan that outlines the procedures to be used in the event of an accidental release of hazardous materials and other potential emergencies. This plan has been provided to the local emergency response organizations and other entities, such as hospitals, that may be utilized in an emergency situation.

Additionally, the EPA, in consultation with CRIT, inspects the facility approximately every six months. During the initial inspection, some issues were found that have subsequently been addressed. The four inspections following the initial inspection have not resulted in any substantive non-compliance issues. EPA submits the results of the inspections to CRIT, BIA and the Arizona Department of Environmental Quality (ADEQ).

To ensure the safety of employees, the facility has established a personnel training program which meets 29 CFR 1910.120. Personnel complete an introductory 40-hour class room training program and are trained for their particular job descriptions within six months after they are hired or promoted. Employees are not assigned to unsupervised positions which would require them to handle hazardous waste until they have completed the introductory training. Continuing training comprised of at least eight hours of refresher-type class room training is also

administered to all employees on an annual basis. Key components of the training program are the proper use and maintenance of the personal protection equipment, emergency response, and the maintenance and inspection requirements of the facility's emergency equipment. Additionally, facility employees are trained annually on the following plant specific safety programs which include: lock-out/tag-out, confined space entry and monitoring, forklift operation, contingency plan, hazard communication and CPR/first aid. The plant also adheres to the regulations of the Occupational Safety and Health Administration (OSHA) and employs a full time Environmental Health and Safety Director to ensure compliance with these regulations. The facility also monitors employee exposure to organic contaminants annually to ensure proper PPE is in use. To date, all employee monitoring has shown that exposures are below the OSHA 8-hour time weight average (TWA) permissible exposure limit (PEL).

Alternative No. 1. The implementation of Alternative No. 1 would have no impact on public health and safety.

No Action Alternative. The implementation of the No Action Alternative would have no impact on public health and safety.

4.F ENVIRONMENTAL JUSTICE AND SECRETARIAL ORDER 3175

The initial EA scoping period was from October 1988 through November 1990. The initial EA and FONSI was approved and made available to the public on March 1, 1991. Agencies providing comments can be found in the initial EA's Appendix G.

Compliance with Executive Order 12898 concerning Environmental Justice was accomplished by making available to the public information concerning the facility, including the proposed action.

Table 4-2 provides a summary of the permits and approvals required for the facility.

WCAI voluntarily participated in the Expanded Public Participation program prior to the submittal of the RCRA Part B application. WCAI consulted with CRIT to determine their opinions relative to the public participation policies before initiating the activities that are described below.

A public meeting was held on October 4, 1994 at the Job Training Partnership Act/Johnson O'Malley Building which is located on the reservation. The stenographic record of the meeting and the sign-in sheets from the meeting are provided in Appendix M. No written comments or materials were received from the public meeting.

A public notice for the meeting was published as a display advertisement in the Parker Pioneer on August 24, 1994. The Parker Pioneer is a newspaper of general circulation within LaPaz County. A copy of the advertisement and proof of publication are provided in Appendix M.

A copy of the public notice was also provided to Mr. Daniel Eddy, Jr., CRIT Tribal Council Chairman, on August 19, 1994. A copy of the letter transmitting the notice is provided in Appendix M. The notice extended an invitation for a tour of the facility to anyone who was interested.

WCAI also posted the notice on a sign at the facility. The sign was large enough to be legible from the facility boundary.

Finally, the notice was also broadcast on August 25, 1994. The broadcast was on a local radio station KLPZ. Proof of the broadcast is provided in Appendix M.

The SEA was submitted for public comment on March 12, 1996 through April 5, 1996. Appendix P contains a list of agencies that were sent a copy of the draft SEA for comment. Appendix P also includes a summary of all of the comments received from these agencies.

There will be at least two more opportunities for public participation during the Part B

application process. These will occur prior to the performance demonstration (trial burn) test program and when EPA has prepared a draft permit decision. A public notice and comment period will occur in each instance. Both of these are expected to occur within approximately the next eight months.

Additionally, the facility is an existing facility, located in an area zoned for industrial activity, provides employment for the local population and poses little risk to the health and safety of the local population. Consideration was given to local minority and low income groups which may be affected by the proposed action. The facility will have a positive economic impact on the Colorado River Indian Tribes. Although priority will be give to Tribal members regarding employment, the possibility exists that some positions will be filled by non-Indian. Therefore, the large Hispanic population present in La Paz County could also benefit from the increased

employment opportunities generated by the facility. Potential negative environmental impacts have been identified as minor and will be mitigated as described in the SEA.

The BIA is charged with protection of Indian trust assets (Secretarial Order 3175). The proposed action site presently engages in the same type industrial activities that will occur as a result of the proposed action. CRIT has also endorsed the proposed expansion by way of a tribal resolution and has issued a building permit which authorizes the required construction activities.

No concerns related to environmental justice (Executive Order 12898) or with the protection of Indian trust assets (Secretarial Order 3175) have been identified.

4.G CUMULATIVE IMPACTS

As stated in the initial EA, residential and industrial development of CRIT Reservation is presently active. Proposed developments reflect an effort by CRIT to pursue economic development on their reservation which include increasing CRIT revenues and employment opportunities.

The potential for growth, including the Proposed Action, will affect the physical and human resources of the region. The resulting cumulative impacts are listed below.

Physical Environment

1. Water Quality - wastewater discharges will increase over current facility discharge rates, although they will be within the discharge rate described in the initial EA.
2. Air Quality - fugitive dust from construction and increased travel on unpaved roadways; minor increases in automobile/truck and process emissions.
3. Minor increases in facility related traffic.

Human Environment

Socioeconomic Conditions - increased employment opportunities during the construction and operation of the processing and warehousing facilities and secondary economic benefits to nearby businesses and attractions.

4.H UNAVOIDABLE ADVERSE IMPACTS

Implementation of mitigation measures can reduce or eliminate adverse impacts associated with the Proposed Action. Unavoidable adverse impacts are those that remain after the application of mitigation measures. These impacts must be considered in the context of growth which is occurring in the area and which would continue regardless of whether or not the Proposed Action is implemented. Unavoidable adverse impacts associated with the proposed action are listed below.

Water Quality. The Proposed Action will increase the wastewater effluent being discharged to the local POTW over the current discharge rates, although the discharge rate will be within the rates described in the initial EA.

Air Resources. The Proposed Action would result in a temporary increase in fugitive dust emissions during construction. Subsequently, emissions from delivery trucks, worker vehicles, and process emissions will increase incrementally and be present over the life of the Proposed Action.

Traffic. The Proposed Action would result in a minor increase in traffic in the area.

4.I RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

For the Proposed Action, short-term is defined as the construction period. Long-term is defined as the operation of the proposed project. Short-term and long-term impacts can be either beneficial or adverse. A list of short-term and long-term impacts follows.

Short-Term Impacts - Beneficial

1. Creation of construction employment opportunities.
2. Opportunities for full-time employment for tribal members.

Short-Term Impacts - Adverse

1. Disturbance of approximately 3 acres within the original 10-acre lease parcel of industrially zoned land.
2. Potential temporary degradation of air quality due to fugitive dust.
3. Temporary elevation of noise levels.
4. Temporary increase in construction traffic on roadways.
5. Potential discharge/release of contaminants (i.e., air emissions, wastewater, spent carbon) due to malfunctions, power failures or other unforeseen events.

Long-Term Impacts - Beneficial

1. Availability of job training and employment opportunities for tribal members.

2. Secondary economic benefits to nearby businesses and attractions.

Long-Term Impacts - Adverse

1. Minor increase in traffic volumes on area roadways.
2. Accelerated deterioration of access roads
3. Incremental increase in water consumption.
4. Incremental increase in air contaminants.
5. Incremental increase in wastewater discharges.
6. Incremental increase in energy consumption.
7. Potential discharge/release of contaminants (i.e., air pollutants, wastewater, spent carbon) due to malfunctions, power failures or other unforeseen events.

4.J IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

Construction and operation of the Proposed Action would result in either the irreversible or irretrievable commitment of certain resources. An irreversible commitment means that once a change in a resource's status occurs, it cannot be restored to its present status. An irretrievable commitment means that the resource in question cannot be recovered or reused during the period of time the Proposed Action is in effect; however, the action is reversible.

Loss of open space, as a result of implementing the Proposed Action, is an irretrievable commitment of resources. These losses could be reversed upon closure of the facility by removing all improvements from the proposed project area.

Water and energy used as a result of implementing the Proposed Action represents an irreversible commitment of these resources. Water and energy cannot be stored by the Tribe for use at some future time or upon expiration of the lease agreement.

TABLE 4-1

SUMMARY OF ENVIRONMENTAL CONSEQUENCES

ENVIRONMENTAL IMPACT CATEGORY	ALTERNATIVES		
	PROPOSED ACTION	ALTERNATIVE 1	NO ACTION ALTERNATIVE
AIR QUALITY	No Significant Impact From Process Emissions	No Significant Impact From Process Emissions	No Change (i.e., current situation remains)
NOISE	No Significant Impact; Minor increase in construction and traffic related noise	No Significant Impact; Minor increase in construction and traffic related noise	No Change
WATER SOURCES	No Significant Impact	No Significant Impact	No Change
WATER QUALITY	No Significant Impact	No Significant Impact	No Change
LAND RESOURCES	No Significant Impact	No Significant Impact	No Change
GEOLOGIC SETTING	No Significant Impact	No Significant Impact	No Change
SOILS	No Significant Impact; Slight Potential for Soil Erosion During Construction	No Significant Impact; Slight Potential for Soil Erosion During Construction	No Change
LAND USE	No Significant Impact	No Significant Impact	No Change
TRANSPORTATION NETWORK	No Significant Impact; Increased Traffic From 1 to 2 Additional Trucks/Day	No Significant Impact; Increased Traffic From 1 to 2 Additional Trucks/Day	No Change
SOCIOECONOMIC AND SOCIOCULTURAL ENVIRONMENT	Increase in employment opportunities	No Significant Impact	No Change
HISTORIC AND ARCHEOLOGICAL FEATURES	No Impact	No Impact	No Change
PUBLIC HEALTH AND SAFETY	No Impact	No Impact	No Change
ENVIRONMENTAL JUSTICE AND SECRETARIAL ORDER 3175	No Impact	No Impact	No Change

TABLE 4-2

**SUMMARY OF WESTATES CARBON-ARIZONA, INC.
PERMITS AND APPROVALS**

PERMIT/APPROVAL	AGENCY	DATE
FONSI Issued - Initial EA	Bureau of Indian Affairs	March 1, 1991
POTW Industrial Wastewater Discharge Permit	CRSSJV	April 5, 1991
Part A Permit Application	EPA Region IX	August 12, 1991
CRIT Resolution Supporting Expansion Second Reactivation Furnace (approximately 1200 lb/hr)	CRIT Tribal Council	February 18, 1994
NPDES General Discharge Permit	USEPA	September 29, 1994
Submittal - Part B Application	EPA Region IX	January 16, 1995
Submittal - Revised Part B Application		November 7, 1995
Federal Aviation Administration Permit Stack/Crane	FAA	April 25, 1995
Prevention of Source Deterioration Applicability (PSD)	EPA Region IX	July 7, 1995
Building Permits	CRIT Building & Safety	July 20, 1995
Benzene NESHAP Approval	EPA Region IX	August 4, 1995
Submittal - Supplemental to Final EA	Bureau of Indian Affairs	February 1, 1996
SEA FONSI Approved	Bureau of Indian Affairs	April 29, 1996

CHAPTER 5

MITIGATION MEASURES

Implementation of mitigation measures can reduce or eliminate adverse impacts associated with a proposed action or alternatives. The following measures have been developed to mitigate the impacts anticipated as a result of the Proposed Action.

5.A PHYSICAL ENVIRONMENT

A Contingency (Emergency Response) Plan has been developed for the facility. This is a written plan that defines the actions that will be taken during an emergency (spills, fire, explosion, or threatened release of hazardous waste) to minimize hazards to human health and the environment. The following additional plans and programs have also been developed for the facility, including a Waste Analysis Plan, a Personnel Training Program, a Performance Demonstration Test Plan, and a Closure Plan. These plans have all been submitted in the RCRA Part B application.

A monitoring and enforcement program and a pollution prevention plan shall be adopted by the lessee within one (1) year of the approved FONSI, in consultation and coordination with the Environmental Protection Agency (EPA), BIA, and CRIT to insure appropriate protection of air and water quality. The intent of the program is to minimize or reduce the facility contaminant emissions and discharge without compromising other control currently in place, approved or proposed (i.e., contaminant monitoring of discharge streams, work area of employees health monitor area, site inspections, etc.)

5.A.1 Air

5.A.1.1 Air Quality

The facilities have been designed with air pollution control (APC) equipment, including the addition of a WESP, that limits potential facility emissions. Combustion parameters, pollution

control equipment effectiveness, and air emissions will be monitored on a continuous basis as part of standard operating procedures by plant personnel. Additionally, periodic plant inspections will be performed by EPA personnel and Tribal environmental personnel. The facility's RCRA Part B permit application describes the APC equipment in detail. Prior to receiving its final RCRA permit, the facility will be required to conduct a performance demonstration to demonstrate that the APC equipment meets the performance goals as described in the RCRA Part B application. Personnel monitoring will continue to be conducted per OSHA guidelines.

Water spray will be applied, as necessary, to reduce blowing dust during construction. The construction contractor will be given responsibility for providing water for dust control.

5.A.1.2 Noise

Mufflers, enclosures, and other noise suppression measures will be incorporated to control the noise generated at the facility. As discussed in Appendix N, the selected ID fan and equipment placement will reduce the noise generated by RF-2.

Construction work schedules will be designed to minimize or reduce noise levels during sensitive times of the day, i.e. in the evening and early morning hours. Truck deliveries will typically occur during daylight hours.

5.A.2 Water

Water utilized at the facility will be recycled to the extent practicable. Areas where water is recycled include the motive water system, the cooling water system and in the air pollution control equipment. Curbs for spill containment will be installed and the Contingency Plan will be implemented to recover spills at the time of occurrence.

5.A.3 Land Resources

No unnecessary disturbances, those not required by the proposed project, of soils and land surface will be made.

5.A.4 Transportation Network

The Office of Hazardous Materials Transportation, U.S. Department of Transportation, has developed detailed procedures and guidelines to handle incidents involving hazardous materials during transportation. These procedures are detailed in the Emergency Response Guidebook (ERG) (DOT P 5800.4). The ERG is a guide to assist first responders in making informed judgments during the initial phases of a transportation incident. The ERG has been widely distributed to state and local public safety authorities.

All transporters must have commercial drivers licenses (CDL). The materials must be transported with DOT-approved tractors and trailers. Any transporter hauling hazardous spent carbon to the facility is required to be certified as a hazardous waste hauler with a specific EPA I.D. number. They must complete 16 hours of hazardous materials handling (with annual 8-hour refresher) and registered with DOT. In California, they must be registered with the Department of Toxic Substance Control. Transporters are also required to carry a minimum of \$1.2 million liability insurance.

5.B SOCIOECONOMICS AND SOCIOCULTURAL ENVIRONMENT

Members of the CRIT shall be given employment preference when qualified and available.

5.C. PUBLIC HEALTH AND SAFETY

The facility has installed air pollution control (APC) equipment which includes an afterburner for the destruction of organic constituents, a venturi scrubber for particulate matter and metals removal, a packed bed (alkaline) scrubber for acid gas removal, and a WESP for additional

particulate and metals removal. The APC equipment is continuously monitored by instrumentation and properly trained operators to ensure proper operation.

All process and storage areas are located within secondary containment structures to ensure that any spills or leaks are contained. Additionally, the facility has written procedures to be implemented in the event of a spill or leak in its Contingency Plan.

All employees handling spent carbon are trained in accordance with 29 CFR 1910.1200 and receive additional specific on-site safety and environmental training. In addition, the facility employs a full-time Environmental, Health and Safety Director.

The facility has performed an air quality analysis based on air dispersion modeling and anticipated stack exhaust parameters. The results of this air quality analysis formed the basis of the Health Risk Assessment which is included in the Part B application.

5.D CULTURAL RESOURCES

Should any archeological remains be encountered during project ground disturbing activities, work will stop in the area of discovery and the stipulations of 36 CFR 800.11 will be followed. The BIA Area Archeologist and the Tribal Museum Director office will be contacted immediately.

5.E. OTHER CONSIDERATIONS

Any proposed expansion of the facility's processing capacity above the RCRA processing capacity of 2760 lb/hr wet spent carbon feed to RF-2 reactivation furnace (i.e., approximately 1200 lb/hr of dry reactivated carbon) as identified in the RCRA Part A and Part B permits and/or exceeds 200,000 gallons of RCRA storage capacity in the existing warehouse, another SEA will be required.

CHAPTER 6

LIST OF AGENCIES AND INDIVIDUALS CONTACTED FOR CONSULTATION

The persons and organization listed below were contacted or submitted comments during the preparation of this supplement to the Environmental Assessment.

STATE AGENCIES

Arizona Department of Commerce

Arizona Department of Environmental Quality

Arizona Department of Transportation

Arizona Department of Public Safety

Natural Resources Conservation Service, Phoenix

Arizona State Parks, State of Arizona Historic Preservation Office, Phoenix

FEDERAL AGENCIES

Bureau of Indian Affairs, Phoenix Area Office

Bureau of Indian Affairs, Colorado River Agency

Bureau of Land Management, Arizona State Office

Department of Interior, Office of Environmental Policy and Compliance, San Francisco, CA

Department of the Army, U.S. Corps of Engineers

U.S. Fish and Wildlife Service, Phoenix Office

U.S. Environmental Protection Agency, Region IX

Indian Health Service, Parker, Arizona

TRIBAL AGENCIES

C.R.I.T. Environmental Office, Parker, Arizona

C.R.I.T. Tribal Council Chairman, Parker Arizona

LOCAL AGENCIES

City of Parker, Parker, Arizona

CHAPTER 7

LIST OF PREPARERS

Bureau of Indian Affairs, Phoenix Area Office

Amy L. Heuslein

POSITION: Environmental Protection Officer

EDUCATION/EXPERIENCE: B.S., Biology, Stephens College
18 years professional experience

SEA RESPONSIBILITY As Federal Project Manager, Ms. Heuslein was responsible for reviewing and approval recommendation of the SEA.

John Krause

POSITION: Hazardous Waste Coordinator

EDUCATION/EXPERIENCE: B.S. Chemical Engineering, University of Arizona
12 years of professional experience

SEA RESPONSIBILITY: Review of SEA

Garry J. Cantley

POSITION: Archaeologist

EDUCATION/EXPERIENCE: M.A. Archaeology, Arizona State University
20 years professional experience

SEA RESPONSIBILITY: Review of SEA

Bureau of Indian Affairs, Colorado River Agency

Goldie Stroup

POSITION: Realty Officer

EXPERIENCE: 26 years professional experience

SEA RESPONSIBILITY: Review of SEA

RUST Environment & Infrastructure

John T. Dent

DISCIPLINE/EXPERTISE: Chemical Engineering, Environmental Permitting and Regulatory Compliance, Air Quality, Water Quality, Resource Conservation and Recovery Act, National Environmental Policy Act

EXPERIENCE: Six years consulting work, Ten years industrial environmental engineering (chemical and power industries)

SEA RESPONSIBILITY: Project Manager, report writing, technical content

REFERENCES

Arizona Department of Commerce, 1995, Town of Parker Community Profile, July 1995.

Arizona Department of Commerce, 1995, Colorado River Indian Reservation Community Profile, July 1995.

Bureau of Indian Affairs, Information Profiles.

Bureau of Indian Affairs, NEPA Handbook, 30 BIAM Supplement 1, Release 1, February 22, 1982.

Final Environmental Assessment (EA); Westates Carbon Reactivation Plant Development Project; Colorado River Indian Reservation, Parker, La Paz County, Arizona; Prepared by Simon Environmental Engineering Enterprises, Inc. for Westates Carbon, Inc., Los Angeles, California; Prepared for the United States Department of the Interior, Bureau of Indian Affairs, Phoenix Area Office, Phoenix, Arizona and the Colorado River Agency, Parker, Arizona; January 1991.

United States Department of the Interior -- PEP - Environmental Compliance Memorandum No. ECM95-2, "Departmental Responsibilities for Indian Trust Lands"; May 15, 1995.

United States Department of the Interior -- Order No. 3175, "Departmental Responsibilities for Indian Trust Land"; November 8, 1993.

United States Department of the Interior -- Order No. 3175, Amendment 1, "Departmental Responsibilities for Indian Trust Land"; August 17, 1994.

United States Department of the Interior -- PEP - Environmental Compliance Memorandum No. ECM95-3, "National Environmental Policy Act (NEPA) Responsibilities Under the Departmental Environmental Justice Policy"; May 30, 1995.

PSD Applicability Determination for the Westates Carbon Arizona, Inc. Carbon Reactivation Facility, Parker, Arizona; Prepared for Westates Carbon Arizona, Inc., Parker Arizona; Prepared by Rust Environment & Infrastructure, Birmingham, Alabama; June 1995.

United States Environmental Protection Agency; Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety; U.S. EPA Report 550/9-74-004, March 1974.

Bolt, Beranek, and Newman, Inc., Fundamentals and Abatement of Highway Traffic Noise; Report No. PB-222-703, : page 1-35; Prepared for Federal Highway Administration; June 1973.

Personal Communication between Monte McCue, WCAI Plant Manager, and Bob Pike, Arizona DOT; February 1996.

Personal Communication between Monte McCue, WCAI Plant Manager, and Carl Pike, Arizona DOT; February 1996.

APPENDICES

Appendix	Description
A	June 3, 1994 Letter From Michael Feeley (U.S. EPA) to Monte McCue (WCAI)
B	July 7, 1995 Letter From David P. Howecamp (U.S. EPA) to Monte McCue (WCAI)
C	August 4, 1995 Letter From Felicia Marcus (U.S. EPA) to Monte McCue (WCAI)
D	Parker, Arizona Community Profile, July 1995
E	Colorado River Indian Reservation Community Profile, July 1995
F	Drawing No. SEAPFD1, Revision 1 - Process Flow Diagram Drawing No. 01-32-001P - Site Plan Drawing No. D14789-02 - Plot Plan
G	Spent Carbon Container Specifications
H	Test Result Summary Pages
I	NPDES Stormwater General Permit Coverage Notice
J	CRIT Support Resolution (February 18, 1994)
K	Building Permit (July 20, 1995)
L	National Historic Preservation Act Compliance/Consultation Requirements
M	Public Meeting Stenographic Record and Sign-In Sheets Public Notice Transmittal Letter (August 19, 1994) Public Notice Proof of Broadcast and Advertisement (August 25, 1994)
N	Effect of Westates Carbon, Parker, Arizona Facility on Community Noise
O	Wind Roses (Wind Speed and Direction Data for Parker Area)
P	Public Comments
Q	CRSSJV and WCAI Permit Limitations Comparison



APPENDIX A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

75 Hawthorne Street
San Francisco, Ca. 94105-3901

RECEIVED JUN 10 1994

JUN 03 1994

In Reply
Refer to: H-3-3
AZD 982 441 263

Mr. Monte McCue
Plant Manager
Westates Carbon-Arizona Inc.
2523 Mutahar Street
Parker AZ 85344

Re: Westates Carbon - Arizona, Inc. ("Westates") Hazardous Waste Treatment Facility
(the "Facility") on the Colorado River Indian Reservation

Dear Mr. McCue:

This letter is in response to the questions you raised at a meeting held on January 6, 1994, regarding the construction of Westates' second thermal treatment unit at the Facility and the submittal of Westates' Part B of the application for a RCRA permit. For convenience, I will refer to your agenda for the meeting (a copy is enclosed).

Agenda Item 2.0 - Addition of Second Unit Under Interim Status

You described the following two alternatives for completing construction of Westates' second unit: 1) install the second unit with capacity that would bring the total design capacity of the Facility to 1,200 lb/hr of dry product; or 2) install the second unit with the total allowed capacity (1200 lb/hr dry product) for the Facility and "shut down" the existing unit. You further stated that for alternative 2, Westates would construct the second unit in two phases, with the first phase resulting in the second unit having the remaining total capacity for the Facility (1200 lb/hr minus capacity of existing unit--approximately 600 lb/hr), and the second phase resulting in the second unit having that total capacity for the Facility. Based on the information that Westates has provided to EPA, we believe that Westates could choose either alternative, subject to the limitations set forth below.

Because Westates described two units with a total capacity of 1200 lb/hr dry product in its Part A of the application for a RCRA permit, Westates could choose to build its second unit as outlined in alternative 1 above. Similarly, Westates could choose alternative 2 as long as the existing unit was disabled when the design capacity of the second unit exceeded the

remaining total capacity for the Facility. More specifically, if Westates chooses to construct the second unit in two phases as described above, Westates must disable the existing unit at the commencement of the second construction phase. This would ensure that at no time would the Facility exceed the total design capacity of 1200 lb/hr dry product while the Facility is in interim status. "Disabling" the existing unit would consist of "locking-out" the starters of the motors for the unit's drive, cooling air fan, combustion air blowers and induced draft fan. If Westates chooses alternative 2, within fifteen (15) days after the design capacity of the second unit exceeds the remaining total capacity for the Facility as described above, Westates must provide evidence to EPA that the existing unit was disabled.

Agenda Item 4 - Other Part B Application Issues

We agree that you may apply for a permit for a total facility capacity of 1800 lb/hr product (existing unit plus second unit). Note, however, that a trial burn for the existing unit will be required before any permit decision can be made. The trial burn for the second unit could also be conducted before a permit decision is made, at your option. Note however, that while one unit is being tested the other unit must be "locked out" in the manner described above.

If you have any questions, please do not hesitate to contact Ray Fox of my staff at (415) 744-2053.

Sincerely,



Michael Feeley, Chief
Permits and Solid Waste Branch

Enclosure

cc: Daniel Eddy Jr. Chairman
Conner Byestewa, Environmental Director
Colorado River Indian Tribes
Route 1, Box 23B
Parker AZ 85344

Amy Heuslein, Environmental Quality Services
Bureau of Indian Affairs, Phoenix Area Office
P.O. Box 10
Phoenix AZ 85001

Allen Anspach, Superintendent
Bureau of Indian Affairs, Colorado River Agency
Route 1, Box 9-C
Parker AZ 85344

Anthony Leverock
Arizona Department of Environmental Quality
3033 North Central Avenue
Phoenix AZ 85012

Matt Killeen
Steven M. Richmond
Wheelabrator Environmental Systems Inc.
Liberty Lane
Hampton NH 03842



APPENDIX B





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

RECEIVED JUL 11 1995

July 7, 1995

FILE COPY

Monte McCue
Plant Manager
2523 Mutahar Street
Post Office Box E
Parker, AZ 85344

Dear Mr. McCue:

Re: Westates Carbon facility applicability determination

This letter is in response to your request for a determination of the applicability of the Prevention of Significant Air Quality Deterioration (PSD) regulations (40 CFR 52.21). We have reviewed the material concerning the proposed modification to the Westates carbon regeneration facility on the Colorado Indian Reservation in Parker, Arizona. As described below, according to our analysis of the maximum potential emissions, the proposed project is not a "major stationary source" or "major modification" as defined in 40 CFR 52.21(b).

In making this determination we have reviewed the information you have submitted, as well as information from similar facilities. We have appreciated your prompt answers to our questions about your facility's operations. For your records, information considered in our review includes:

- Your PSD Applicability Determination Report, dated June 2, 1995.
- Process flow diagrams and other applicable data from your 40 CFR 61 subpart FF Benzene NESHAP Application, dated June 6, 1995.
- Source test data from volumes III and IV of your RCRA Part B Permit Application, dated January 1995.
- Permits for similar facilities including those permitted by: EPA Region 10 (Cameron-Yakima facility), Pennsylvania Department of Environmental Resources (Darlington and Beaver Falls Environtrol facilities), and the Oklahoma Department of Environmental Quality (Elf Atochem facility).

- Information concerning sulfur content of spent carbon and particulate carry-over from EPA's Alternative Control Technology Document - Carbon Reactivation Processes (EPA 453/R-92-019, December 1992).
- Your correspondence with Jennifer Fox including a meeting in San Francisco (June 6, 1995), and conference calls (June 22, 1995 and June 27, 1995).

As we have discussed, whether a new source or modification is subject to PSD review is dependent on whether that source has the "potential to emit" major amounts of a regulated pollutant. The Westates carbon facility in question lacks federally enforceable limits on potential emissions because state and local air agencies have no permitting authority on Indian lands. Therefore, in the absence of federally enforceable limitations, the source's potential to emit (PTE) must be calculated by considering the unrestricted operations of the source. Under these conditions, the calculated emission rates (listed below) are well above expected emissions levels, but still under above the major source/modification applicability threshold of 250 tons per year.

<u>Pollutant</u>	<u>Emission Rate</u> <u>tons/year</u>
Sulfur Dioxide	76
Nitrogen Oxides	15
Particulates (PM-10)	200
Carbon Monoxide	8
Volatile Organic Compounds	20
Lead	1

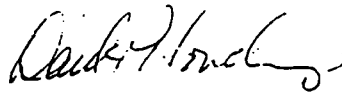
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Therefore, based on the information you have provided us in your submittal, the EPA has determined that this project is conditionally exempt from the requirements of the PSD regulations. Although exempt from PSD, the source is still subject to all applicable air pollution rules and regulations (including the Benzene NESHAP requirement of 40 CFR Part 61 subpart FF). Also future construction, modification, or changes in operation procedures may require review by this office concerning any necessary permits if such actions are planned. This determination will expire if construction has not commenced by June 30, 1997.

After the issuance of this letter, should the EPA determine that the project is a major source or major modification and subject to PSD, then this source will have to immediately apply for a federal PSD permit. All requirements of the PSD regulations will have to be satisfied even though construction may be complete. In the event that vendor guaranteed emission rates are not achieved, it will still be the source's responsibility to comply with all PSD requirements. Failure to comply with the requirements of the PSD regulations or continued operation of such a source prior to receiving a final PSD permit may subject the source to federal enforcement action pursuant to Section 113 of the Clean Air Act.

If you have any questions regarding this matter, please contact Jennifer Fox of our New Source Section at (415) 744-1257.

Sincerely,



David P. Howekamp
Director
Air and Toxics Division

cc: Matt Killeen, Wheelabrator Environmental

FILE COPY

APPENDIX C



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

OFFICE OF THE
REGIONAL ADMINISTRATOR

August 4, 1995

FILE COPY

Mr. Monte McCure
Plant Manager
Wheelabrator Environmental Systems, Inc.
2523 Mutahar Street
Post Office Box E
Parker, AZ 85344

Dear Mr. McCure:

This is in response to your June 6, 1995, application for approval of the proposed modification of the Westate Carbon-Arizona, Inc. facility located in Parker, Arizona. According to the application you submitted, this facility, which reactivates spent carbon, is subject to the National Emission Standards for Hazardous Air Pollutants regulations (40 CFR Part 61).

Based on the information submitted by your office, the United States Environmental Protection Agency has decided to approve the proposed modification pursuant to 40 CFR § 61.08. However, this approval is granted contingent with the understanding that any revision to the plans and specifications which may affect the amount of the hazardous air pollutants emitted must receive prior approval from this office.

Please be advised that this approval to modify the existing carbon reactivation facility is not to be interpreted as a waiver of legal responsibility for compliance with any applicable provisions of 40 CFR Part 61 or other applicable Federal, State, or local regulatory requirements.

If you have any questions concerning this approval, please contact John Kim of the Air Inspection and Enforcement Section at (415) 744-1263.

Yours,

A handwritten signature in cursive script, appearing to read "Felicia Marcus".

Felicia Marcus
Regional Administrator

cc: Matthew Killeen, WESI

APPENDIX D

Community Profile

Parker

Parker is on the east bank of the Colorado River, 163 miles west of Phoenix. The Parker "vicinity" consists of a number of separate but interrelated areas. There is the town of Parker, Parker South, the Arizona side of the Colorado river area, and the communities on the California side. Established in 1871, the town was moved some four miles north to the site of the Atchison, Topeka and Santa Fe Railroad crossing. At an elevation of 450 feet above sea level, Parker was founded in 1908 and incorporated in 1948. In May, 1982, by initiative petition, voters formed La Paz County from the northern portion of the former Yuma County. On January 1, 1983, Parker became the county seat for La Paz county.

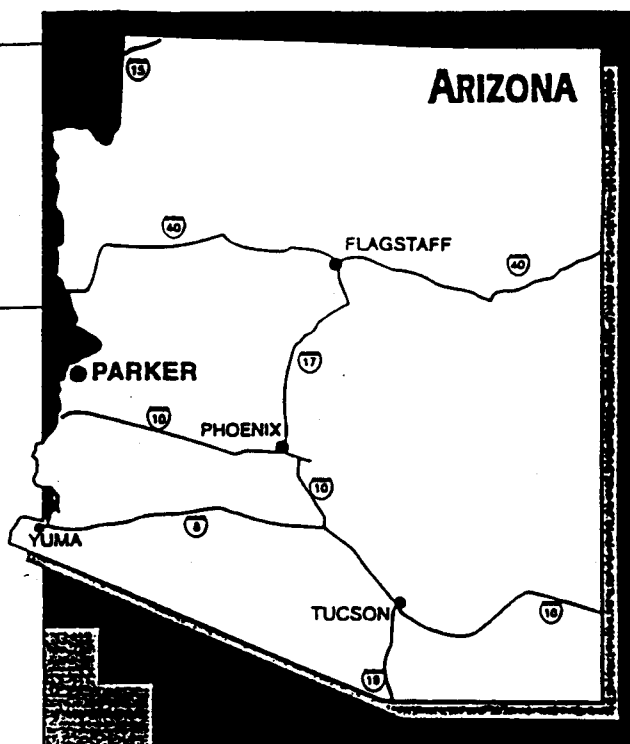
PRINCIPAL ECONOMIC ACTIVITIES

Parker's economy is based primarily on retail trade and services. The 11-mile strip of the Colorado River, contained between Parker Dam and Headgate Rock Dam, form one of the finest bodies of water in the country for water-based recreational activities, making Parker a major destination point for tourists and winter visitors. Motels, campgrounds, eighteen hole golf course, mobile home, RV Parks, restaurants, gasoline stations and convenience markets serve both the winter and summer visitor. Parker also serves as the trade center for the Colorado River Indian Reservation and small towns along the Colorado River.

Agriculture, historically the major economic base of Parker, continues to contribute to the local economy. The fertile fields of the Colorado River yield melons, lettuce, cotton, wheat, barley and alfalfa. The 270,000-acre Colorado River Indian Reservation has been guaranteed water for irrigation by the U.S. Supreme Court. The tribe operates small farms but also leases much of its land to large corporate farms.

SCENIC ATTRACTIONS

The Colorado River and its dams and lakes offer visitors to Parker



a variety of water recreation activities including excellent fishing for bass, crappie, bluegill, catfish, trout, and frogging during season; speed boat racing, golf, tubing and swimming. Parker Dam, the deepest dam in the world, has self-guided tours daily.

There are two state parks and one county park in the Parker area. Buckskin State Park, 11 miles north of Parker, has acres of green grass and shade trees. River Island State Park has 26 campsites, day-use areas and boat launches. La Paz County Park, eight miles north of Parker, has campgrounds, showers, a launching ramp, baseball diamond, tennis courts and 1,000 feet of waterfront, hook-ups and dump station.

A museum containing an extensive collection of locally crafted Indian artifacts, including Chemehuevi basketry, Mojave pottery, Indian beads and jewelry, is operated by the Colorado Indian Tribes.

POPULATION

	1980	1990	1994
Parker*	2,542	2,897	2,920
La Paz County	N/A**	13,844	16,075
Arizona	2,716,546	3,665,228	4,071,650

Sources: Arizona Department of Economic Security and U.S. Census Bureau

* Local sources estimate the trade area population to be 5,335 for 1989.

** La Paz County was established in 1983.

PARKER LABOR FORCE DATA

	1989	1990	1994
Civilian Labor Force	1,568	1,352	1,412
Employed	1,503	1,272	1,262
Unemployed	65	80	150
Unemployment Rate	4.1%	5.9%	10.6%

Source: Arizona Department of Economic Security

GROWTH INDICATORS

	1990	1993	1994
Taxable Sales (\$)	31,702,250	31,061,000	31,915,950***
Postal Receipts *(\$)	637,147	686,367	711,998
New Bldg. Permits Issued**	104	124	103
Public School Enrollment	2,332	2,622	2,667
Net Assessed Valuation (\$)	11,297,761	12,182,162	12,892,029

* Postal receipts are for fiscal year.

** Town of Parker

*** 1994 tax rate varies, rate used is for most transactions.

Parker

PROPERTY TAX RATE PER \$100 ASSESSED VALUATION

	1990	1993	1994
Arizona State Tax	\$0.47	\$0.47	\$0.47
Community College	1.92	2.21	2.22
County Fire District	0.07	0.10	.10
County	2.78	3.00	2.90
County Total	\$5.24	\$5.78	\$5.69
Parker Unified #27	3.30	4.94	4.83
Town of Parker	.00	.00	.00
Total	\$8.54	\$10.72	\$10.52

Source: Arizona Tax Research Foundation

Note: Property tax in Arizona is based on assessed valuation which is less than market value. Therefore, it is not possible to compute taxes for a particular piece of property based on these numbers.

COMMUNITY FACILITIES

Parker's community facilities include one museum, two libraries and the Colorado River Indian Tribal Museum. The recreational facilities include six area parks, an indoor theater, a rodeo arena, a senior citizen center, one 18 hole golf course, an-olympic size swimming pool, two lighted tennis courts, a recreation center, a golf driving range and several basketball, handball and badminton courts.

Communication. In addition to communication resources from the rest of the state, Parker has three weekly newspapers, *The Parker Post*, *The Gem*, and *The Sun Times*, a local AM radio station, and several local television stations, along with several radio and television channels from Lake Havasu, Blythe, Phoenix, Yuma and Tempe. Many television channels are via cable and satellite, including one sports channel, one educational channel, one religious channel, one movie channel and Home Box Office.

Educational. There are four schools in the Parker Unified School District and six schools in La Paz County. Parker has two preschools, an active Head-Start program and NAU Extension courses. Arizona Western College, a fully accredited two-year community college established in Yuma in 1961, has a campus at the La Paz Center in Parker. The center offers more than 70 courses each semester. In addition to degree and vocational programs, courses can be designed to meet specific needs of the community or businesses.

Medical. There is one hospital with 39 beds; physicians, dentists, chiropractors, and one naturopathic are also available. Ambulance service is provided by Parker Ambulance Service with three vehicles, and CRIT-AIR, charter air ambulances. The hospital has a helicopter pad.

Financial. There are five financial institutions with eight local offices in the area. Further, La Paz County businesses are eligible for assistance in financing fixed assets through the Strategic Finance Division of the Arizona Department of Commerce.

Governmental. The Town of Parker is governed by a mayor, six council members and a town manager. There is a sheriff's department, a local police department, and a fire department with about 30 volunteers.

Airport. The residents of Parker have access to the Avi-Suquilla Airport which has one 4,800-foot hard surface, lighted runway, ATIS, radio, fuel and ground transportation.

Industrial Properties. The Town of Parker has an industrial park, zoned for light and heavy industry, with sites ranging from five to 38 acres. Contact the Parker Economic Development Office for further information.

The Arizona & California Railroad Company, Ltd. has two parcels available for industrial development. A 15-acre parcel is adjacent to the railroad in Parker and has all utilities. The other parcel is 100 acres in the annexed area known as Parker South. Contact the Railroad at: 1301 California Avenue, Parker, AZ 85344 or the Chamber of Commerce.

The Colorado River Tribes own a 100-acre industrial park in Parker. Parcels range in size from 2.7 to 12 acres, and all utilities are available. There is also easy access to truck, rail and air transportation. For further information, contact the Colorado River Tribal Council, Parker, AZ 85344, (520) 669-9211 or Parker Area Chamber of Commerce.

Utilities

Electricity:	Arizona Public Service	(520) 669-2248
	Bureau of Indian Affairs	669-7111
Natural Gas:	Southwest Gas Corporation	(800) 821-1989
Telephone:	Contel Telephone Company	669-6454
Water:	Municipal	669-9265
Sewer:	Joint Venture	669-9821

Lodging and Meeting Facilities. There are 23 motels with 426 units and six meeting facilities with the largest seating 600 persons; also 40 mobile and RV parks with 4,289 units plus campgrounds for tent camping.

WEATHER

Month	Average Temperature (°F)		Average Total Precipitation (Inches)	Month	Average Temperature (°F)		Average Total Precipitation (Inches)
	Daily Max.	Daily Min.			Daily Max.	Daily Min.	
January	67.3	37.1	0.53	August	106.7	78.2	0.56
February	72.9	41.7	0.32	September	102.5	70.2	0.26
March	78.7	46.6	0.52	October	91.4	57.8	0.29
April	87.0	53.6	0.22	November	77.5	44.9	0.32
May	95.3	61.9	0.03	December	68.3	38.1	0.46
June	103.3	69.6	0.01				
July	108.6	78.8	0.30	Year	88.3	56.5	3.82

Average Total Snow, Sleet and Hail Annually: Trace (Based on a 30-year average)

This profile was prepared by the Arizona Department of Commerce Communication and Research Division in cooperation with the Parker Area Chamber of Commerce and the Town of Parker.

For further information, contact:

Parker Area Chamber of Commerce	Town of Parker
1217 California Avenue	1314 11th Street
P.O. Box 627	Box 609
Parker, AZ 85344	Parker, AZ 85344
(520) 669-2174	(520) 669-9265

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Arizona Department of Commerce

3800 N. Central Ave., Ste. 1400
Phoenix, AZ 85012
(602) 280-1321
FAX: (602) 280-1305

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APPENDIX E

contents of Appendix E
not in our file copy
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19 Aug 2003
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Arizona Department of Commerce

Community Profile

Colorado River Indian Reservation

Colorado River Indian Reservation

lands are in Arizona (225,995 acres) and California (42,696 acres). Tribal lands are low arid desert and river bottom with abrupt mountain ranges. The Colorado River provides 90 miles of shoreline running north to south along the reservation.

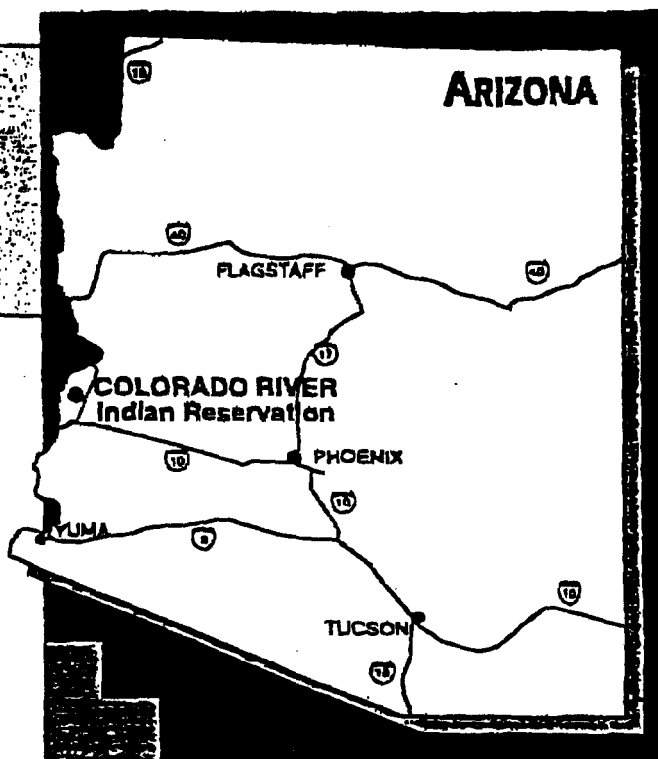
In 1864, Charles Debrille Poston, the first Indian superintendent for Arizona, selected the area as Arizona's second Indian reservation. It was established March 3, 1865, for the "Indians of said river and its tributaries." The Mohave have inhabited the area for centuries, while members of the Chemehuevi, Hopi, and Navajo tribes relocated to the reservation later.

The incorporated community of Parker is located on and surrounded by reservation lands. A second community, Poston, is located on the reservation, 20 miles south of Parker.

PRINCIPAL ECONOMIC ACTIVITIES

The reservation economy is centered around agriculture, recreation, government and light industry, which is expanding. The fertile river-bottom lands and available water allow irrigated agriculture which produces cotton, alfalfa, wheat, feed grains, lettuce, and melons. Approximately 84,500 acres are now under cultivation and another 50,500 are available for development.

The Colorado River is the basis of an established recreation and tourism industry. Marinas, lodging facilities, food and beverage establishments, beaches, mobile home parks, and cabanas have been built. Recreational development leases and homesite leases are available. In addition, the Blue Water Casino opened in April 1995 and employs over 250.



SCENIC ATTRACTIONS

The Colorado River, dams and lakes, is the reservation's greatest recreational and scenic attraction. Lakes Moovay and Havasu are formed behind Headgate and Parker Dams. Facilities for swimmers, boaters and water-skiers may be found along the shoreline. Fishing for trout, striped bass, bass, catfish, crappie and bluegill is excellent in the river. Dove, quail, waterfowl, rabbit and predator hunting is excellent. Reservation hunting and fishing permits are required.

Tribal occupation of the area is evidenced by petroglyphs, pictographs, ancient trails and intaglios. The Tribal Museum and Library attempt to preserve and interpret the heritage of each of the four tribes of the reservation as well as the general history of the area. Through the Museum, the tribes maintain two national historic sites, the Old Mohave Presbyterian Mission and the Old Arizona frontier community of La Paz, Arizona. These are open to the public.

POPULATION

	1980	1990	1994
Colorado River Indian Reservation (members)	2,504	3,035	3,127
La Paz County	12,557	13,844	16,075
Arizona	2,716,546	3,665,228	4,071,650

Sources: Arizona Department of Economic Security; U.S. Census Bureau; Colorado River Indian Tribe, Enrollment Department; Arizona Statistical Review, 1994.

GROWTH INDICATORS

	1990	1993	1994
Postal Receipts (\$)*			
(Parker)	637,147	686,367	711,998
Parker Unified School District	2,332	2,622	2,667

*Postal receipts are for fiscal year.

LABOR FORCE DATA

	1980	1990	1994
Civilian Labor Force	609	2,831	3,016
Employed	406	2,602	2,583
Unemployed	203	229	433
Unemployment Rate	33.3%	8.1%	14.4%

Source: Arizona Department of Economic Security and Bureau of Indian Affairs (BIA)



Colorado River Indian Reservation

TAXES

The State of Arizona does not tax Indian lands and Indian-owned property on reservations. Incomes of Indians residing on reservations are not taxed by the State if wholly derived from reservation sources. The Federal Government does not exempt individual Indians from income or other federal taxes. Indian people of Arizona are also exempt from state and local sales taxes on consumer goods purchased on the reservation, unless such taxes are imposed by the tribal government. However, the State of Arizona collects taxes from reservation residents on sales of gasoline, electricity, natural gas, and telephone service.

Source: Arizona Property Tax Rates and Assessed Valuation.

COMMUNITY FACILITIES

The Colorado River Indian Reservation offers a wide range of community facilities including a library-museum, two gymnasiums, two parks, two baseball diamonds, a fairgrounds, community center, rodeo grounds, and a marina with trailer park, beaches, cabanas, and picnic area.

Special events include National Indian Days and Miss Indian Arizona Pageant in September and All-Indian Rodeo in December.

Communication. In addition to communication resources from the rest of the state, the community has a local area weekly newspaper, radio stations from Lake Havasu City, one local television channel from Parker, and eleven additional channels via cable and satellite.

Educational. All reservation children attending local public schools attend the Parker Unified School District.

Arizona Western College (in Yuma) and Northern Arizona University (in Flagstaff) offer extension courses at the Parker High School and the Tribal Educational Service Center.

Medical. There is one hospital with 20 beds and laboratory, X-ray, emergency room facilities, four physicians, one dentist, seven community health representatives, two field nurses, a health educator, and a sanitarian available. Additional medical facilities and services are available in Parker.

Financial. There are five financial institutions with local branch offices located in nearby Parker. For information about state financial programs, contact the Arizona Department of Commerce, (602) 280-1300.

Governmental. The community is governed by a chairman, vice chairman, and council members. There is a local police department and a fire department with 27 volunteers.

Airport. Residents have access to the Avi Suquilla Airport which has a lighted, 4,800-foot runway, UNICOM, radio and fuel.

Industrial Properties. The 140-acre Colorado River Tribes Industrial Park is fully improved with paved streets, all utilities and rail, air, and highway access. Contact the Colorado River Indian Tribes Resources Development Committee.

Utilities

Electricity:	Bureau of Indian Affairs	(520) 669-7173
	Arizona Public Service	669-2248
Natural Gas:	Southwest Gas Corporation	669-2228
Telephone:	Continental Telephone Co.	669-2221
Water:	CRIT Regional Water System	669-9211
Sewer:	Jointly operated by Tribes and Parker	

WEATHER

Month	Average Temperature (°F)		Average Total Precipitation (Inches)	Month	Average Temperature (°F)		Average Total Precipitation (Inches)
	Daily Max.	Daily Min.			Daily Max.	Daily Min.	
January	67.3	37.1	0.53	August	105.7	78.2	0.56
February	72.9	41.7	0.32	September	102.5	76.2	0.26
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May	93.3	61.9	0.03	December	68.3	38.1	0.46
June	103.3	69.6	0.01				
July	108.6	78.8	0.30	Year	88.3	56.5	3.82

Average Total Snow, Sleet and Hail Annually: Trace

Source: Parker Weather Reporting Station, elevation 425 ft.

This profile was prepared by the Arizona Department of Commerce Communication and Research Division in cooperation with the Colorado River Indian Tribes Planning Department.

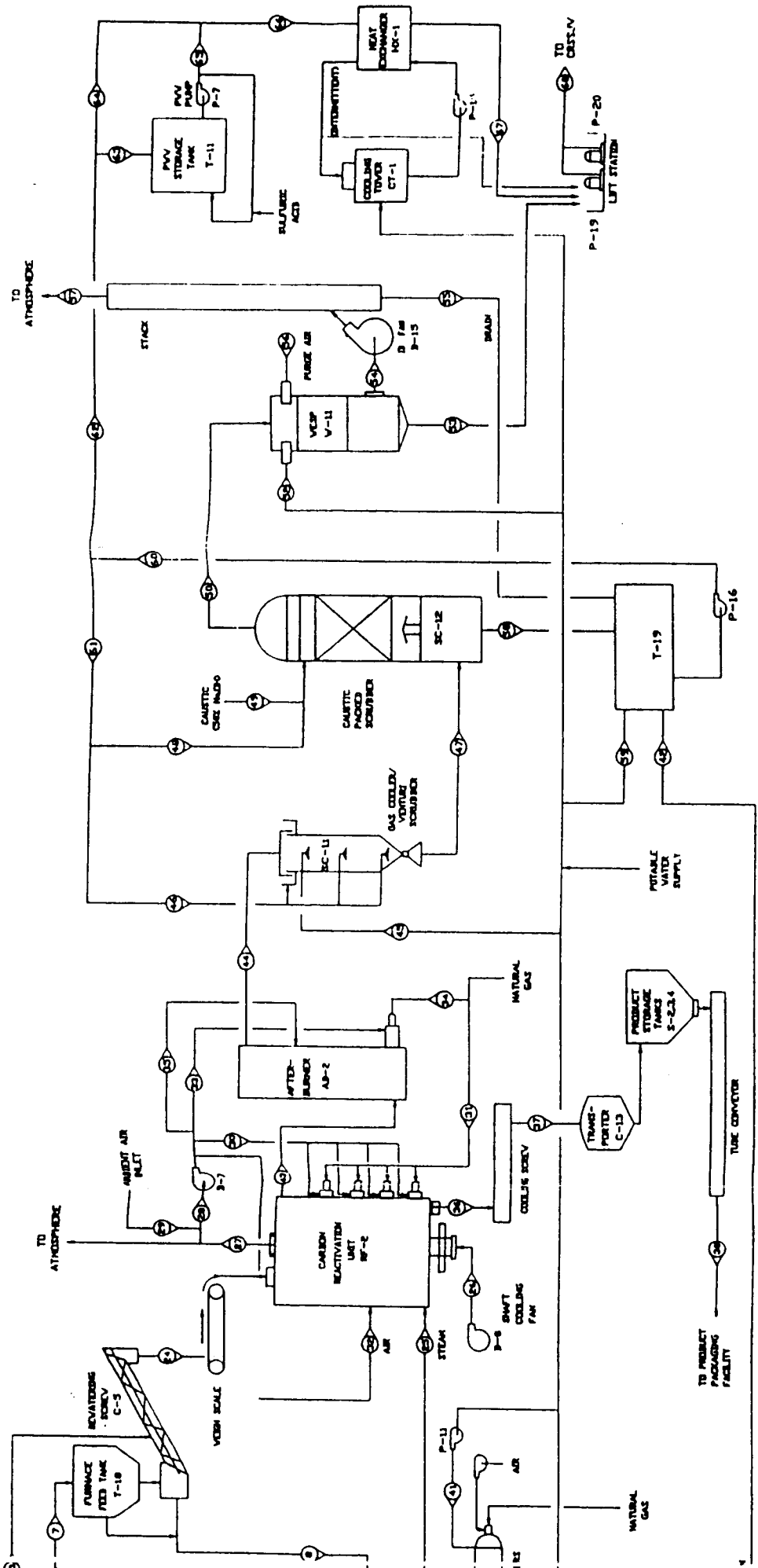
For further information, contact:

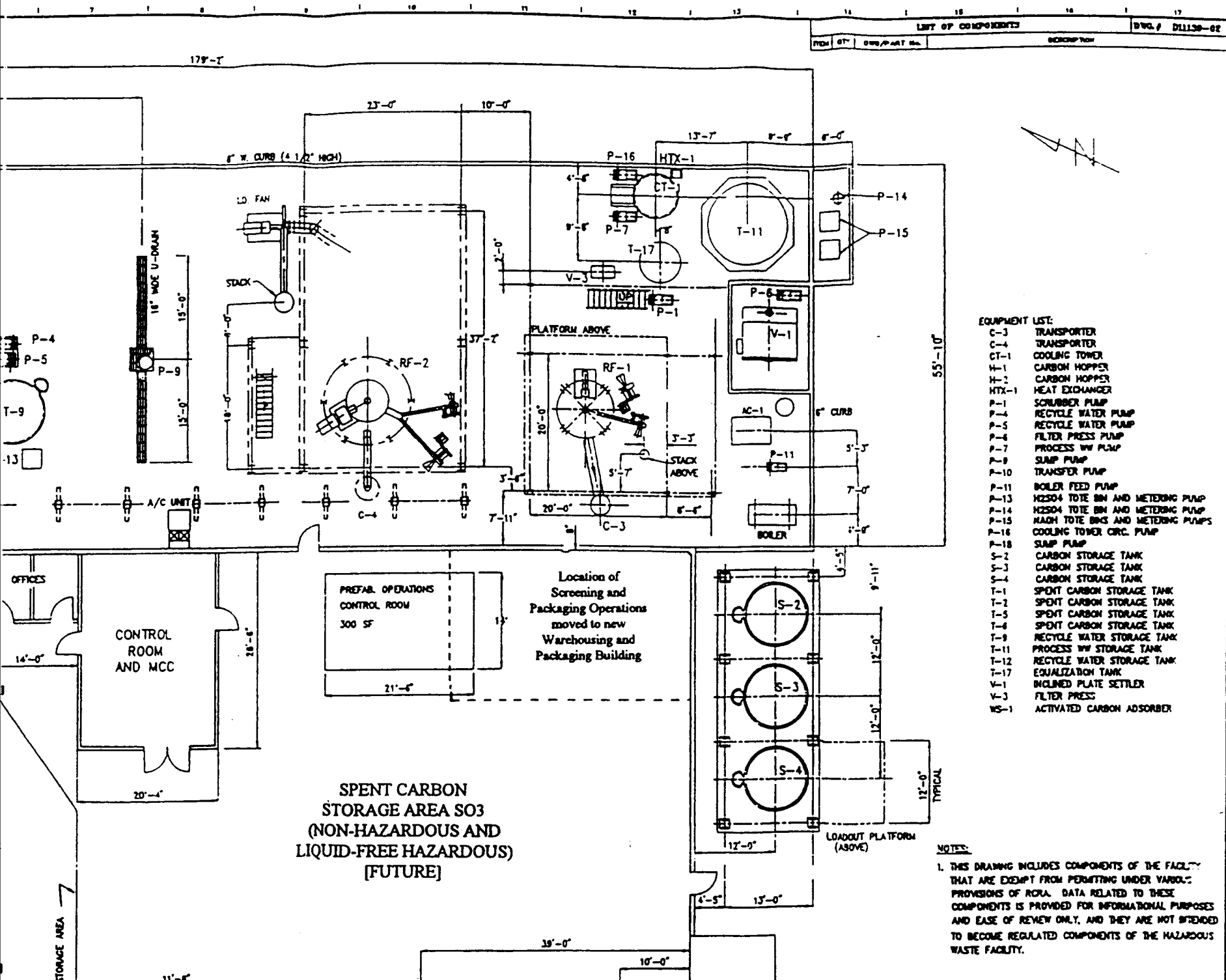
Colorado River Indian Tribes
Rt 1 - Box 23-B
Parker, AZ 85344
(520) 669-9211

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